

Trendwood, Inc.
261 East University Drive
Permit Number V99-001
Table of Contents
November 30, 2002

GENERAL CONDITIONS	Page 1
1. AIR POLLUTION PROHIBITED	Page 1
2. CIRCUMVENTION	Page 1
3. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS	Page 1
4. COMPLIANCE	Page 2
A. Compliance Required.....	Page 2
B. Compliance Certification Requirements	Page 2
C. Compliance Plan	Page 3
5. CONFIDENTIALITY CLAIMS	Page 3
6. CONTINGENT REQUIREMENTS	Page 3
A. Acid Rain.....	Page 3
B. Asbestos.....	Page 4
C. Risk Management Plan (RMP)	Page 4
D. Stratospheric Ozone Protection	Page 4
7. DUTY TO SUPPLEMENT OR CORRECT APPLICATION	Page 5
8. EMERGENCY EPISODES	Page 5
9. EMERGENCY PROVISIONS.....	Page 5
10. EXCESS EMISSIONS.....	Page 6
11. FEES	Page 8
12. MODELING	Page 8
13. MONITORING / TESTING	Page 8
14. PERMITS.....	Page 9
A. Basic	Page 9
B. Dust Control Plan Requirements	Page 9
C. Permits and Permit Changes, Amendments and Revisions	Page 9
D. Posting	Page 10
E. Prohibition on Permit Modification.....	Page 10
F. Renewal	Page 10
G. Revision / Reopening / Revocation	Page 11
H. Revision Pursuant to a Federal Hazardous Air Pollutant Standard	Page 12
I. Requirements for a Permit	Page 12
J. Rights and Privileges.....	Page 13
K. Severability.....	Page 13
L. Scope	Page 13
M. Term of Permit	Page 14

N.	Transfer.....	Page 14
15.	RECORDKEEPING.....	Page 14
A.	Records Required	Page 14
B.	Retention of Records.....	Page 14
C.	Monitoring Records	Page 14
D.	Right of Inspection of Records	Page 15
16.	REPORTING.....	Page 15
A.	Annual Emission Inventory Report	Page 15
B.	Data Reporting	Page 15
C.	Deviation Reporting	Page 15
D.	Emergency Reporting	Page 16
E.	Emission Statements Required as Stated in the Act.....	Page 16
F.	Excess Emissions Reporting	Page 16
G.	Other Reporting.....	Page 17
17.	RIGHT TO ENTRY AND INSPECTION OF PREMISES	Page 17
SPECIFIC CONDITIONS		Page 19
18.	ALLOWABLE EMISSIONS LIMITATIONS	Page 19
19.	OPERATIONAL LIMITATIONS AND STANDARDS.....	Page 21
A.	Facility-Wide Operational Requirements.....	Page 21
B.	Operational Requirements for Woodworking Equipment Vented Outdoors	Page 21
C.	Operational Requirements for Baghouses	Page 21
D.	Operational Requirements for Spray Coating Equipment	Page 22
E.	Operational Requirements for Coating Wood Furniture and Fixtures	Page 23
F.	Operational Requirements for Custom Dip Tanks.....	Page 26
20.	MONITORING AND RECORDKEEPING REQUIREMENTS.....	Page 26
A.	Facility-Wide Requirements	Page 26
B.	Monitoring and Recordkeeping Requirements for Baghouses	Page 29
C.	Monitoring and Recordkeeping Requirements for Spray Coating	Page 30
D.	Monitoring and Recordkeeping Requirements for Coating Wood Furniture.....	Page 30
21.	REPORTING REQUIREMENTS.....	Page 32
A.	Semi-Annual Monitoring Report.....	Page 32
22.	TESTING REQUIREMENTS.....	Page 34
SPECIFIC CONDITIONS FOR SUPPORT ACTIVITIES		Page 34
23.	PERMIT CONDITIONS FOR ARCHITECTURAL COATING.....	Page 34
A.	Operational Limitations and Standards	Page 34
B.	Monitoring and Recordkeeping Requirements	Page 36
C.	Reporting Requirements	Page 36
24.	PERMIT CONDITIONS FOR CUTBACK AND EMULSIFIED ASPHALT	Page 36
A.	Operational Limitations and Standards	Page 36
B.	Monitoring and Recordkeeping Requirements	Page 37
C.	Reporting Requirements	Page 37

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In accordance with Maricopa County Air Pollution Control Rules and Regulations (Rules), Rule 210 § 302.2, all Conditions of this Permit are federally enforceable unless they are identified as being locally enforceable only. However, any Permit Condition identified as locally enforceable only will become federally enforceable if, during the term of this Permit, the underlying requirement becomes a requirement of the Clean Air Act (CAA) or any of the CAA's applicable requirements.

All federally enforceable terms and conditions of this Permit are enforceable by the Administrator of the United States Environmental Protection Agency (Administrator or Administrator of the USEPA hereafter) and citizens under Section 304 of the CAA.

Any cited regulatory paragraphs or section numbers refer to the version of the regulation that was in effect on the first date of public notice of the applicable Permit Condition unless specified otherwise.

GENERAL CONDITIONS:

- 1. AIR POLLUTION PROHIBITED:** [County Rule 100 §301][SIP Rule 3]
The Permittee shall not discharge from any source whatever into the atmosphere regulated air pollutants which exceed in quantity or concentration that specified and allowed in the County or State Implementation Plan (SIP) Rules, the Arizona Administrative Code (AAC) or the Arizona Revised Statutes (ARS), or which cause damage to property or unreasonably interfere with the comfortable enjoyment of life or property of a substantial part of a community, or obscure visibility, or which in any way degrade the quality of the ambient air below the standards established by the Maricopa County Board of Supervisors or the Director of the Arizona Department of Environmental Quality (ADEQ).
- 2. CIRCUMVENTION:** [County Rule 100 §104][40 CFR 60.12][40 CFR 63.4(b)]
The Permittee shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of regulated air pollutants to the atmosphere, conceals or dilutes an emission which would otherwise constitute a violation of this Permit or any Rule or any emission limitation or standard. The Permittee shall not circumvent the requirements concerning dilution of regulated air pollutants by using more emission openings than is considered normal practice by the industry or activity in question.
- 3. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS:**
[County Rule 100 §401] [County Rule 210 §§301.7, 302.1e(1), 305.1c(1) & 305.1e]
Any application form, report, or compliance certification submitted under the County Rules or these Permit Conditions shall contain certification by a responsible official of truth, accuracy, and completeness of the application form or report as of the time of submittal. This certification and any other certification required under the County Rules or these Permit

Conditions shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

4. COMPLIANCE:

A. COMPLIANCE REQUIRED:

- 1) The Permittee must comply with all conditions of this permit and with all applicable requirements of Arizona air quality statutes and the air quality rules. Compliance with permit terms and conditions does not relieve, modify, or otherwise affect the Permittee's duty to comply with all applicable requirements of Arizona air quality statutes and the Maricopa County Air Pollution Control Regulations. Any permit non-compliance is grounds for enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. Noncompliance with any federally enforceable requirement in this Permit constitutes a violation of the Act. [This Condition is federally enforceable if the condition or requirement itself is federally enforceable and only locally enforceable if the condition or requirement itself is locally enforceable only]

[County Rule 210 §§301.8b(4) & 302.1h(1)]

- 2) The Permittee shall halt or reduce the permitted activity in order to maintain compliance with applicable requirements of Federal laws, Arizona laws, the County Rules, or other conditions of this Permit.

[County Rule 210 §302.1h(2)]

- 3) For any major source operating in a nonattainment area for any pollutant(s) for which the source is classified as a major source, the source shall comply with reasonably available control technology (RACT) as defined in County Rule 100.

[County Rule 210 §302.1(h)(6)] [SIP Rule 220 §302.1]

Compliance with the RACT requirements of this Permit Condition for nitrogen oxides (NO_x) shall not be required if a waiver granted by the Administrator under Section 182 (f) of the Clean Air Act is in effect.

- 4) For any major source operating in a nonattainment area designated as serious for PM₁₀, for which the source is classified as a major source for PM₁₀, the source shall comply with the best available control technology (BACT), as defined in County Rule 100.

[County Rule 210 §302.1(h)(7)]

B. COMPLIANCE CERTIFICATION REQUIREMENTS: [County Rule 210 §305.1d]

The Permittee shall file an annual compliance certification with the Control Officer and also with the Administrator of the USEPA. The report shall certify compliance with the terms and conditions contained in this Permit, including emission limitations, standards, or work practices. The certification shall be on a form supplied or approved by the Control Officer and shall include each of the following:

- 1) The identification of each term or condition of the permit that is the basis of the certification;
- 2) The compliance status;
- 3) Whether compliance was continuous or intermittent;

- 4) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
- 5) Other facts as the Control Officer may require to determine the compliance status of the source.

The annual certification shall be filed at the same time as the second semiannual monitoring report required by the Specific Condition section of these Permit Conditions and every 12 months thereafter.

C. COMPLIANCE PLAN: [County Rule 210 §305.1g]

Based on the certified information contained in the application for this Permit, the facility is in compliance with all applicable requirements in effect as of the release date of the proposed conditions for this Permit. The Permittee shall continue to comply with all applicable requirements and shall meet any applicable requirements that may become effective during the term of this permit on a timely basis. [This Condition is federally enforceable if the applicable requirement itself is federally enforceable and only locally enforceable if the applicable requirement itself is locally enforceable only]

5. CONFIDENTIALITY CLAIMS: [County Rule 100 §402] [County Rule 200 §411]

Any records, reports or information obtained from the Permittee under the County Rules or this Permit shall be available to the public, unless the Permittee files a claim of confidentiality in accordance with ARS §49-487(c) which:

- A. precisely identifies the information in the permit(s), records, or reports which is considered confidential, and
- B. provides sufficient supporting information to allow the Control Officer to evaluate whether such information satisfies the requirements related to trade secrets or, if applicable, how the information, if disclosed, could cause substantial harm to the person's competitive position.

The claim of confidentiality is subject to the determination by the Control Officer as to whether the claim satisfies the claim for trade secrets.

A claim of confidentiality shall not excuse the Permittee from providing any and all information required or requested by the Control Officer and shall not be a defense for failure to provide such information.

If the Permittee submits information with an application under a claim of confidentiality under ARS 49-487 and County Rule 200, the Permittee shall submit a copy of such information directly to the Administrator of the USEPA.

[County Rule 210 §301.5]

6. CONTINGENT REQUIREMENTS:

NOTE: This Permit Condition covers activities and processes addressed by the CAA which may or may not be present at the facility. This condition is intended to meet the requirements of both Section 504(a) of the 1990 Amendments to the CAA, which requires that Title V permits contain conditions necessary to assure compliance with applicable requirements of the Act as well as the Acid Rain provisions required to be in all Title V permits.

- A. ACID RAIN: [County Rule 210 §§302.1b(2) & 302.1f][County Rule 371 §301]
- 1). Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the CAA and incorporated under County Rule 371, both provisions shall be incorporated into this Permit and shall be enforceable by the Administrator.
 - 2) The Permittee shall not allow emissions exceeding any allowances that the source lawfully holds under Title IV of the CAA or the regulations promulgated thereunder and incorporated under County Rule 371.
 - a) No permit revision shall be required for increases in emissions that are authorized by allowances acquired under the acid rain program and incorporated under County Rule 371, provided that such increases do not require a permit revision under any other applicable requirement.
 - b) No limit is placed on the number of allowances held by the Permittee. The Permittee may not, however, use allowances as a defense to non-compliance with any other applicable requirement.
 - c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the CAA.
 - d) All of the following prohibitions apply to any unit subject to the provisions of Title IV of the CAA and incorporated into this Permit under County Rule 371:
 - (1) Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners or operators of the unit or the designated representative of the owners or operators.
 - (2) Exceedances of applicable emission rates.
 - (3) The use of any allowance prior to the year for which it was allocated.
 - (4) Violation of any other provision of the permit.
- B. ASBESTOS: [40 CFR 61, Subpart M][County Rule 370 §301.8 - locally enforceable only]
- The Permittee shall comply with the applicable requirements of Sections 61.145 through 61.147 and 61.150 of the National Emission Standard for Asbestos and County Rule 370 for all demolition and renovation projects.
- C. RISK MANAGEMENT PLAN (RMP): [40 CFR 68]
- Should this stationary source, as defined in 40 CFR 68.3, be subject to the accidental release prevention regulations in 40 CFR Part 68, then the Permittee shall submit an RMP by the date specified in 40 CFR Section 68.10 and shall certify compliance with the requirements of 40 CFR Part 68 as part of the annual compliance certification as required by 40 CFR Part 70. However, neither the RMP nor modifications to the RMP shall be considered to be a part of this Permit.
- D. STRATOSPHERIC OZONE PROTECTION: [40 CFR 82 Subparts E, F, and G]
- If applicable, the Permittee shall follow the requirements of 40 CFR 82.106 through 82.124 with respect to the labeling of products using ozone depleting substances.

If applicable, the Permittee shall comply with all of the following requirements with respect to recycling and emissions reductions:

- 1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices under 40 CFR 82.156.
- 2) Equipment used during maintenance, service, repair, or disposal of appliances must meet the standards for recycling and recovery equipment in accordance with 40 CFR 82.158.
- 3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by a certified technician under 40 CFR 82.161.

If applicable, the Permittee shall follow the requirements of 40 CFR 82 Subpart G, including all Appendices, with respect to the safe alternatives policy on the acceptability of substitutes for ozone-depleting compounds.

7. DUTY TO SUPPLEMENT OR CORRECT APPLICATION: [County Rule 210 §301.6]

If the Permittee fails to submit any relevant facts or has submitted incorrect information in a permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a proposed permit.

8. EMERGENCY EPISODES: [County Rule 600 §302] [SIP Rule 72.A.5. e, f & g]

If an air pollution alert, warning, or emergency has been declared, the Permittee shall comply with any applicable requirements of County Rule 600 §302.

9. EMERGENCY PROVISIONS: [County Rule 130 §§201 & 402]

An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that cause the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the requirements of this Permit Condition are met.

The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- A. An emergency occurred and that the Permittee can identify the cause or causes of the emergency;
- B. At the time of the emergency, the permitted source was being properly operated;
- C. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in this permit; and
- D. The Permittee as soon as possible telephoned the Control Officer, giving notice of the emergency, and submitted notice of the emergency to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirement

of County Rule 210 §302.1.e(2) with respect to deviation reporting. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

This provision is in addition to any emergency or upset provision contained in any applicable requirement.

10. EXCESS EMISSIONS: [County Rule 140 §§103, 401 & 402][locally enforceable only]

NOTE: This Permit Condition is based on a County Rule which has not been approved as part of the State Implementation Plan and is therefore applicable only at the County level.

There are reporting requirements associated with excess emissions. These requirements are contained in the Reporting section of the General Permit Conditions in a subparagraph called Excess Emissions. The definition of excess emissions can be found in County Rule 100 §200.

A. Exemptions: The excess emissions provisions of this Permit Condition do not apply to the following standards and limitations:

- 1) Promulgated pursuant to Section 111 (Standards Of Performance for New Stationary Sources) of the Clean Air Act (Act) or Section 112 (National Emission Standards For Hazardous Air Pollutants) of the Act;
- 2) Promulgated pursuant to Title IV (Acid Deposition Control) of the Act or the regulations promulgated thereunder and incorporated under Rule 371 (Acid Rain) of these rules or Title VI (Stratospheric Ozone Protection) of the Act;
- 3) Contained in any Prevention Of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the Environmental Protection Agency (EPA);
- 4) Included in a permit to meet the requirements of Rule 240 (Permit Requirements For New Major Sources And Major Modifications To Existing Major Sources), Subsection 308.1(e) (Permit Requirements For Sources Located In Attainment And Unclassified Areas) of these rules.

B. Affirmative Defense For Malfunctions: Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. The owner and/or operator of a source with emissions in excess of an applicable emission limitation due to malfunction has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner and/or operator of the source has complied with the excess emissions reporting requirements of these Permit Conditions and has demonstrated all of the following:

- 1) The excess emissions resulted from a sudden and unavoidable breakdown of the process equipment or the air pollution control equipment beyond the reasonable control of the operator;
- 2) The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
- 3) If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and

overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, then the owner and/or operator satisfactorily demonstrated that such measures were impractical;

- 4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
- 5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
- 6) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
- 7) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in County Rule 510 that could be attributed to the emitting source;
- 8) The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
- 9) All emissions monitoring systems were kept in operation, if at all practicable; and
- 10) The owner's and/or operator's actions in response to the excess emissions were documented by contemporaneous records.

C. Affirmative Defense For Startup And Shutdown:

- 1) Except as provided in paragraph 2) below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. The owner and/or operator of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner and/or operator of the source has complied with the excess emissions reporting requirements of these Permit Conditions and has demonstrated all of the following:
 - a. The excess emissions could not have been prevented through careful and prudent planning and design;
 - b. If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
 - c. The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
 - d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable, during periods of such emissions;
 - e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
 - f. During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in County Rule 510 (Air Quality Standards) that could be attributed to the emitting source;

- g. All emissions monitoring systems were kept in operation, if at all practicable; and
 - h. The owner's and/or operator's actions in response to the excess emissions were documented by contemporaneous records.
- 2) If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to paragraph A. of this Permit Condition.
- D. **Affirmative Defense For Malfunctions During Scheduled Maintenance:** If excess emissions occur due to malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to paragraph A. of this Permit Condition.
- E. **Demonstration Of Reasonable And Practicable Measures:** For an affirmative defense under paragraphs A and B of this Permit Condition, the owner and/or operator of the source shall demonstrate, through submission of the data and information required by this Permit Condition and the excess emissions reporting requirements of these Permit Conditions, that all reasonable and practicable measures within the owner's and/or operator's control were implemented to prevent the occurrence of the excess emissions.

11. FEES: [County Rule 200 §409][County Rule 210 §§302.1i & 401]
The Permittee shall pay fees to the Control Officer under ARS 49-480(D) and County Rule 280.

12. MODELING: [County Rule 200 §407][locally enforceable only]
Where the Control Officer requires the Permittee to perform air quality impact modeling, the Permittee shall perform the modeling in a manner consistent with the "Guideline on Air Quality Models (Revised)" (EPA-450/2-78-027R, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, N.C. 27711, July 1986) and "Supplement B to the Guideline on Air Quality Models" (U.S. Environmental Protection Agency, September 1990). Both documents shall be referred to hereinafter as "Guideline", and are adopted by reference. Where the person can demonstrate that an air quality impact model specified in the guideline is inappropriate, the model may be modified or another model substituted if found to be acceptable to the Control Officer.

13. MONITORING / TESTING:

- A. The Permittee shall monitor, sample, or perform other studies to quantify emissions of regulated air pollutants or levels of air pollution that may reasonably be attributable to the facility if required to do so by the Control Officer, either by Permit or by order in accordance with County Rule 200 §309.

[County Rule 200 §309] [SIP Rule 41]

- B. Except as otherwise specified in these Permit Conditions or by the Control Officer, the Permittee shall conduct required testing used to determine compliance with standards or permit conditions established under the County or SIP Rules or these Permit Conditions in accordance with County Rule 270 and the applicable testing procedures

contained in the applicable Rule, the Arizona Testing Manual for Air Pollutant Emissions or other approved USEPA test methods.

[County Rule 200 §408][County Rule 210 §302.1.c][County Rule 270 §§300 & 400]
[SIP Rule 27]

- C. The owner or operator of a permitted source shall provide, or cause to be provided, performance testing facilities as follows:
- 1) Sampling ports adequate for test methods applicable to such source.
 - 2) Safe sampling platform(s).
 - 3) Safe access to sampling platforms(s).
 - 4) Utilities for sampling and testing equipment.

[County Rule 270 §405][SIP Rule 42]

14. PERMITS:

- A. BASIC: [County Rule 210 §302.1h(3)]

This Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

- B. DUST CONTROL PLAN REQUIREMENTS:

(NOTE: If the Permittee engages in or allows any routine dust generating activities at the facility, the Permittee shall apply to have the routine dust generating activity covered as part of this Permit. Nonroutine activities, such as construction and revegetation, require a separate Earthmoving Permit that must be obtained from the Control Officer before the activity may begin.)

- 1) The Permittee must first submit a Dust Control Plan and obtain the Control Officer's approval of the Dust Control Plan before commencing any routine dust generating operation.

[County Rule 310 §303.3] [SIP Rule 310 §303.3]

- 2) A Dust Control Plan shall not be required to play on a ball field and/or for landscape maintenance. For the purpose of this Permit Condition, landscape maintenance does not include grading, trenching, nor any other mechanized surface disturbing activities.

[County Rule 200 §305] [County Rule 310 §303.4] [SIP Rule 310 §303.4]

- 3) Any Dust Control Plan shall, at a minimum, contain all the information described in Section 304 of Rule 310.

[County Rule 310 §304] [SIP Rule 310 §304]

- 4) Regardless of whether an approved Dust Control Plan is in place or not, the Permittee is still subject to all requirements of Rule 310 at all times

[County Rule 310 §303] [SIP Rule 310 §303]

- C. PERMITS AND PERMIT CHANGES, AMENDMENTS AND REVISIONS:

[County Rule 200 §§301 & 308] [County Rule 210 §§301.4a, b, c, & 400]

- 1) The Permittee shall comply with the Administrative Requirements of Section 400 of County Rule 210 for all changes, amendments and revisions at the facility for any source subject to regulation under County Rule 200, shall comply with all required time frames, and shall obtain any required preapproval from the

Control Officer before making changes. All applications shall be filed in the manner and form prescribed by the Control Officer. The application shall contain all the information necessary to enable the Control Officer to make the determination to grant or to deny a permit or permit revision including information listed in County Rule 200 §308 and County Rule 210 §§301 & 302.3.

- 2) The Permittee shall supply a complete copy of each application for a permit, a minor permit revision, or a significant permit revision directly to the Administrator of the USEPA. The Control Officer may require the application information to be submitted in a computer-readable format compatible with the Administrator's national database management system.

[County Rule 210 §§303.1a, 303.2, 405.4, & 406.4]

- 3) While processing an application, the Control Officer may require the applicant to provide additional information and may set a reasonable deadline for a response.

[County Rule 210 §301.4f]

- 4) No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

[County Rule 210 §302.1j]

D. POSTING:

- 1) The Permittee shall keep a complete permit clearly visible and accessible on the site where the equipment is installed.

[County Rule 200 §311] [SIP Rule 22F]

- 2) If a Dust Control Plan, as required by Rule 310, has been approved by the Control Officer, the Permittee shall post a copy of the approved Dust Control Plan in a conspicuous location at the work site, within on-site equipment, or in an on-site vehicle, or shall otherwise keep a copy of the Dust Control Plan available on site at all times.

[County Rule 310 §401] [SIP Rule 310 §401]

E. PROHIBITION ON PERMIT MODIFICATION:

[County Rule 200 §310]

The Permittee shall not willfully deface, alter, forge, counterfeit, or falsify this permit.

F. RENEWAL:

[County Rule 210 §§301 & 302]

- 1) The Permittee shall submit an application for the renewal of this Permit in a timely and complete manner. For purposes of permit renewal, a timely application is one that is submitted at least six months, but not more than 18 months, prior to the date of permit expiration. A complete application shall contain all of the information required by the County Rules including Rule 200 §308 and Rule 210 §§301 & 302.3.

[County Rule 210 §§301.2a, 301.4a, b, c, d, h & 302.3]

- 2) The Permittee shall file all permit applications in the manner and form prescribed by the Control Officer. To apply for a permit renewal, the Permittee shall

complete the "Standard Permit Application Form" and shall supply all information, including the information required by the "Filing Instructions" as shown in Appendix B of the County Rules, which is necessary to enable the Control Officer to make the determination to grant or to deny a permit which shall contain such terms and conditions as the Control Officer deems necessary to assure a source's compliance with the requirements of the CAA, ARS and County Rules.

[County Rule 200 §§308 & 309] [County Rule 210 §301.1]

- 3) The Control Officer may require the Permittee to provide additional information and may set a reasonable deadline for a response.

[County Rule 210 §301.4f]

- 4) If the Permittee submits a timely and complete application for a permit renewal, but the Control Officer has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the renewal permit has been issued or denied. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit, by the deadline specified by the Control Officer, any additional information identified as being needed to process the application.

[County Rule 200 §403.2] [County Rule 210 §§301.4f & 301.9]

G. REVISION / REOPENING / REVOCATION:

- 1) This permit shall be reopened and revised to incorporate additional applicable requirements adopted by the Administrator pursuant to the CAA that become applicable to the facility if this permit has a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this Permit is due to expire unless the original permit or any of its terms have been extended pursuant to Rule 200 §403.2.

[County Rules 200 §402.1]

Any permit revision required under this Permit Condition, 14.G.1, shall reopen the entire permit and shall comply with provisions in County Rule 200 for permit renewal (*Note: this includes a facility wide application and public comment on the entire permit*) and shall reset the five year permit term.

[County Rules 200 §402.1a(1) & 210 §302.5]

- 2) This permit shall be reopened and revised under any of the following circumstances:
 - a) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Title V permit.
 - b) The Control Officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - c) The Control Officer or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue a permit under this Permit Condition, 14.G.2, shall follow the same procedures as apply to initial permit issuance and shall effect only those parts of the Permit for which cause to reopen exists.

[County Rule 200 §402.1]

- 3) This permit shall be reopened by the Control Officer and any permit shall be revised, when it is determined that standards or conditions in the permit are based on incorrect information provided by the applicant.

[County Rule 210 §407.3]

- 4) This Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

[County Rule 210 §302.1h(3)]

H. REVISION UNDER A FEDERAL HAZARDOUS AIR POLLUTANT STANDARD:

[County Rule 210 §301.2c] [locally enforceable only]

If the Permittee becomes subject to a standard promulgated by the Administrator under Section 112(d) of the CAA, the Permittee shall, within 12 months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

I. REQUIREMENTS FOR A PERMIT:

- 1) Air Quality Permit: Except as noted under the provisions in Sections 403 and 405 of County Rule 210, no source may operate after the time that it is required to submit a timely and complete application, except in compliance with a permit issued under County Rule 210. Permit expiration terminates the Permittee's right to operate. However, if a source submits a timely and complete application, as defined in County Rule 210 §301, for permit issuance, revision, or renewal, the source's failure to have a permit is not a violation of the County Rules until the Control Officer takes final action on the application. The Source's ability to operate without a permit as set forth in this paragraph shall be in effect from the date the application is determined to be complete until the final permit is issued. This protection shall cease to apply if, subsequent to the completeness determination, the applicant fails to submit, by the deadline specified in writing by the Control Officer, any additional information identified as being needed to process the application. If a source submits a timely and complete application for a permit renewal, but the Control Officer has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the permit renewal has been issued or denied.

[County Rule 210 §301.9]

2) Earthmoving Permit:

(NOTE: If the Permittee engages in or allows any routine dust generating activities at the facility, the Permittee shall apply to have the routine dust generating activity covered as part of this Permit. Non-routine activities, such as construction and revegetation, require a separate Earthmoving Permit that must be obtained from the Control Officer before the activity may begin.)

No person shall commence any earth moving operation or any dust generating operation without meeting the requirements of and obtaining any and all Earth Moving Equipment Permits and Permits to Operate required by County Rule 200. The provisions of this section shall not apply:

- a) During emergency, life threatening situations or in conjunction with any officially declared disaster or state of emergency;
- b) To operations conducted by essential service utilities to provide electricity, natural gas, oil and gas transmission, cable television, telephone, water, and sewerage during service outages and emergency disruptions;
- c) To non-routine or emergency maintenance of flood control channels and water retention basins.
- d) To vehicle test and development facilities and operations when dust is required to test and validate design integrity, product quality and/or commercial acceptance. Such facilities and operations shall be exempted from the provisions of this section only if such testing is not feasible within enclosed facilities.

[County Rule 310 §302] [SIP Rule 310 §302]

The Permittee shall not cause, commence, suffer, allow, or engage in any earthmoving operation that disturbs a total surface area of 0.10 acre or more without first obtaining a permit from the Control Officer. Permits shall not be required for earthmoving operations for emergency repair of utilities, paved roads, unpaved roads, shoulders, and/or alleys.

[County Rule 200 §305]

- 3) Burn Permit: The Permittee shall obtain a Permit To Burn from the Control Officer before conducting any open outdoor fire except for the activities listed in County Rule 314 §§302.1 and 302.2.

[County Rule 314][County Rule 200 §306][SIP Rule 314]

J. RIGHTS AND PRIVILEGES: [County Rule 210 §302.1h (4)]

This Permit does not convey any property rights nor exclusive privilege of any sort.

K. SEVERABILITY: [County Rule 210 §302.1g]

The provisions of this Permit are severable, and, if any provision of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.

L. SCOPE:

The issuance of any permit or permit revision shall not relieve the Permittee from compliance with any Federal laws, Arizona laws, or the County or SIP Rules, nor does any other law, regulation or permit relieve the Permittee from obtaining a permit or permit revision required under the County Rules.

[County Rule 200 §308] [SIP Rule 22H]

Nothing in this permit shall alter or affect the following:

- 1) The provisions of Section 303 of the Act (Emergency Orders), including the authority of the Administrator of the USEPA under that section.
- 2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
- 3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act.
- 4) The ability of the Administrator of the USEPA or of the Control Officer to obtain information from the Permittee under Section 114 of the Act, or any provision of State law.
- 5) The authority of the Control Officer to require compliance with new applicable requirements adopted after the permit is issued.

[locally enforceable only]
[County Rule 210 §407.2]

M. TERM OF PERMIT:

[County Rule 210 §§302.1a & 402]

This Permit shall remain in effect for no more than 5 years from the date of issuance.

N. TRANSFER:

[County Rule 200 §404]

Except as provided in ARS 49-429 and County Rule 200, this permit may be transferred to another person if the Permittee gives notice to the Control Officer in writing at least 30 days before the proposed transfer and complies with the permit transfer requirements of County Rule 200 and the administrative permit amendment procedures under County Rule 210.

15. RECORDKEEPING:

A. RECORDS REQUIRED:

[County Rule 100 §501][County Rule 310 §502][SIP Rule 40 A]

The Permittee shall maintain records of all emissions testing and monitoring, records detailing all malfunctions which may cause any applicable emission limitation to be exceeded, records detailing the implementation of approved control plans and compliance schedules, records required as a condition of any permit, records of materials used or produced, and any other records relating to the emission of air contaminants which may be requested by the Control Officer.

B. RETENTION OF RECORDS:

Unless a longer time frame is specified by these Permit Conditions, information and records required by applicable requirements and copies of summarizing reports recorded by the Permittee and submitted to the Control Officer shall be retained by the Permittee for 5 years after the date on which the information is recorded or the report is submitted

[County Rule 100 §504] [SIP Rule 40 C]

The Permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[County Rule 210 §§302.1d(2)]

C. MONITORING RECORDS: [County Rule 210 §§302.1d(1) & 305.1b(1)]

Records of any monitoring required by this Permit shall include the following:

- 1) The date, place as defined in the permit, and time of sampling or measurements;
- 2) The date(s) analyses were performed;
- 3) The name of the company or entity that performed the analysis;
- 4) The analytical techniques or methods used;
- 5) The results of such analysis; and
- 6) The operating conditions as existing at the time of sampling or measurement.

D. RIGHT OF INSPECTION OF RECORDS: [County Rule 100 §106][SIP Rule 40 D]

When the Control Officer has reasonable cause to believe that the Permittee has violated or is in violation of any provision of County Rule 100 or any County Rule adopted under County Rule 100, or any requirement of this permit, the Control Officer may request, in writing, that the Permittee produce all existing books, records, and other documents evidencing tests, inspections, or studies which may reasonably relate to compliance or noncompliance with County Rules adopted under County Rule 100. No person shall fail nor refuse to produce all existing documents required in such written request by the Control Officer.

16. REPORTING:

NOTE: See the Permit Condition titled Certification Of Truth, Accuracy and Completeness in conjunction with reporting requirements.

A. ANNUAL EMISSION INVENTORY REPORT:

[County Rule 100 §505][SIP Rule 40 B]

Upon request of the Control Officer and as directed by the Control Officer, the Permittee shall complete and shall submit to the Control Officer an annual emissions inventory report. The report is due by April 30, or 90 days after the Control Officer makes the inventory form(s) available, whichever occurs later.

The annual emissions inventory report shall be in the format provided by the Control Officer.

The Control Officer may require submittal of supplemental emissions inventory information forms for air contaminants under ARS §49-476.01, ARS §49-480.03 and ARS §49-480.04.

B. DATA REPORTING: [County Rule 100 §502]

When requested by the Control Officer, the Permittee shall furnish to the Maricopa County Air Quality Division (Division hereafter) information to locate and classify air contaminant sources according to type, level, duration, frequency, and other characteristics of emissions and such other information as may be necessary. This

information shall be sufficient to evaluate the effect on air quality and compliance with the County or SIP Rules. The Permittee may subsequently be required to submit annually, or at such intervals specified by the Control Officer, reports detailing any changes in the nature of the source since the previous report and the total annual quantities of materials used or air contaminants emitted.

- C. DEVIATION REPORTING: [County Rule 210 §§302.1e & 305.1c]
The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions. Unless specified otherwise elsewhere in these Permit Conditions, an upset for the purposes of this Permit Condition shall be defined as the operation of any process, equipment or air pollution control device outside of either its normal design criteria or operating conditions specified in this Permit and which results in an exceedance of any applicable emission limitation or standard. The Permittee shall submit the report to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days from knowledge of the deviation. The report shall contain a description of the probable cause of such deviations and any corrective actions or preventive measures taken. In addition, the Permittee shall report within a reasonable time of any long-term corrective actions or preventative actions taken as the result of any deviations from permit requirements.

All instances of deviations from the requirements of this Permit shall also be clearly identified in the semiannual monitoring reports required in the Specific Condition section of these Permit Conditions.

- D. EMERGENCY REPORTING: [County Rule 130 §402.4]
(NOTE: Emergency Reporting is one of the special requirements which must be met by a Permittee wishing to claim an affirmative defense under the emergency provisions of County Rule 130. These provisions are listed earlier in these General Conditions in the section titled "Emergency Provisions". Since it is a form of deviation reporting, the filing of an emergency report also satisfies the requirement of County Rule 210 to file a deviation report.)
The Permittee shall, as soon as possible, telephone the Control Officer giving notice of the emergency, and submitted notice of the emergency to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

- E. EMISSION STATEMENTS REQUIRED AS STATED IN THE ACT: [County Rule 100 §503]
Upon request of the Control Officer and as directed by the Control Officer, the Permittee shall provide the Control Officer with an emission statement, in such form as the Control Officer prescribes, showing measured actual emissions or estimated actual emissions of NO_x and volatile organic compounds (VOC) from that source. At a minimum, the emission statement shall contain all information contained in the "Guidance on Emission Statements" document as described in the USEPA's Aerometric Information Retrieval System (AIRS) Fixed Format Report (AFP 644). The statement shall contain emissions for the time period specified by the Control Officer. Statements shall be submitted annually.

F. EXCESS EMISSIONS REPORTING:

[County Rule 140 §500][locally enforceable only]

(NOTE: This reporting subsection is associated with the requirements listed earlier in these General Conditions in the section titled "Excess Emissions".)

- 1) The owner and/or operator of any source shall report to the Control Officer any emissions in excess of the limits established by the County or SIP Rules or by these Permit Conditions. The report shall be in two parts as specified below:
 - a) Notification by telephone or facsimile within 24 hours of the time when the owner and/or operator first learned of the occurrence of excess emissions that includes all available information from paragraph 2) of this Permit Condition.
 - b) Detailed written notification by submission of an excess emissions report within 72 hours of the notification required by paragraph 1) a) of this Permit Condition.
- 2) The excess emissions report shall contain the following information:
 - a) The identity of each stack or other emission point where the excess emissions occurred;
 - b) The magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
 - c) The time and duration or expected duration of the excess emissions;
 - d) The identity of the equipment from which the excess emissions emanated;
 - e) The nature and cause of such emissions;
 - f) The steps taken, if the excess emissions were the result of a malfunction, to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions;
 - g) The steps that were or are being taken to limit the excess emissions; and
 - h) If this Permit contains procedures governing source operation during periods of startup or malfunction and the excess emissions resulted from startup or malfunction, a list of the steps taken to comply with the Permit procedures.
- 3) In the case of continuous or recurring excess emissions, the notification requirements of this Permit Condition shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in the notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification pursuant to paragraphs 1) and 2) of this Permit Condition.

G. OTHER REPORTING:

[County Rule 210 §302.1h(5)]

The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing this permit, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by this Permit. For information claimed to be confidential, the Permittee shall furnish a copy of such

records directly to the Administrator of the USEPA along with a claim of confidentiality as covered elsewhere in these Permit Conditions.

17. RIGHT TO ENTRY AND INSPECTION OF PREMISES:

[County Rule 100 §105][County Rule 210 §305.1f][SIP Rule 43]

The Control Officer, during reasonable hours, for the purpose of enforcing and administering County Rules or any provision of ARS relating to the emission or control prescribed pursuant thereto, may enter every building, premises, or other place, except the interior of structures used as private residences. Every person is guilty of a petty offense under ARS §49-488 who in any way denies, obstructs or hampers such entrance or inspection that is lawfully authorized by warrant.

The Permittee shall allow the Control Officer or his authorized representative, upon presentation of proper credentials and other documents as may be required by law, to:

- A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
- B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
- C. Inspect, at reasonable times, any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
- E. To record any inspection by use of written, electronic, magnetic, and photographic media.

[Locally enforceable only]

SPECIFIC CONDITIONS:

18. ALLOWABLE EMISSIONS LIMITATIONS

The allowable emission limitations of these Permit Conditions are based upon the facility as presently constructed and operated. They do not provide for facility changes or changes in the method of operation that would otherwise trigger new applicable requirements including New Source Review (NSR) or Best Available Control Technology (BACT).

A. Facility-Wide Requirements

- 1) The Permittee shall not cause, allow, or permit emissions in excess of the monthly and 12 month rolling limits shown in Table 1, below.

[County Rule 210 §301.8b(4)][County Rule 100 §§200.16 and 200.50]

Table 1: Facility-Wide Emissions Limits

	Monthly Emission Limits	*Rolling 12 - Month Emission Limits
Total Volatile Organic compounds (VOCs)	10 tons	99 tons
PM ₁₀	1.0 ton	10 tons
Any Single Hazardous Air Pollutant (HAP)	0.5 ton	5 tons
Total Hazardous Air Pollutants (HAPs)	1.0 ton	5 tons

* The rolling twelve month emissions shall be calculated by summing the total emissions over the most recent twelve calendar months.

2) Particulate Matter Limits

- a) The Permittee shall not discharge or cause or allow the discharge of particulate matter into the ambient air from any affected operation in excess of the allowable hourly emission rate determined by the following equation:

$$E = 3.59 P^{0.62}$$

Where:

E = Emissions in pounds per hour, and

P = Process weight rate in tons per hour.

[County Rule 311 §301.1][SIP Rule 301.1]

The total process weight from all similar operations at a facility, plant or premises shall be used for determining the maximum allowable emissions of particulate matter.

[County Rule 311 §302][SIP Rule 311 §302]

- b) In the event that the Permittee may exceed the applicable standard set forth in County Rule 311 §301.1 and above, the Permittee may comply by installing and operating an approved emission control system. The Murphy Rogers pulse-jet type baghouse installed at the facility and listed in the equipment list is an approved emission control system as of the effective date of this permit.

[County Rule 311 §305][SIP Rule 311 §305]

2) Opacity Limits

- a) The Permittee shall not discharge into the ambient air from any single source of emissions any air contaminant, other than uncombined water, in excess of 20 percent opacity, except as provided in County Rule 300 §302.
[County Rule 300 §§301 and 302][locally enforceable only]
- b) Except as otherwise provided in Regulation I, Rule 4, Exceptions, the opacity of any plume or effluent from any source of emissions, other than uncombined water, shall not be greater than 40 percent opacity as determined by Reference Method 9 in the Arizona Testing Manual.

[SIP Rule 30]

19. OPERATIONAL LIMITATIONS AND STANDARDS

A. Facility-Wide Operational Requirements

- 1) The Permittee shall not emit gaseous or odorous air contaminants from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.
[County Rule 320 §300][locally enforceable only]
- 2) Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalis, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices or equipment shall be mandatory.
[County Rule 320 §302][SIP Rule 32C]
- 3) Where a stack, vent or other outlet is at such a level that air contaminants are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet to a degree that will adequately dilute, reduce or eliminate the discharge of air contaminants to adjoining property.
[County Rule 320 §303][SIP Rule 32D]
- 4) Training:
The Permittee shall fully train all individuals before they are allowed to operate any surface coating equipment. Training shall include, at a minimum, proper application techniques, cleaning procedures, and equipment setup and adjustment as well as recordkeeping, VOC containment and disposal requirements. Refresher training shall be given at least annually.
[County Rule 210 §301.8b(4)][County Rule 100 §§200.16 and 200.50]

B. Operational Requirements for Woodworking Equipment Vented Outdoors

- 1) The Permittee shall install, operate and maintain an approved emission control device on all wood working equipment vented outdoors. Such woodworking equipment shall be vented to the device without bypass. This requirement does not apply to any hand held equipment.
- 2) The Permittee shall operate the baghouse with:
 - a) No less than 99% removal efficiency for particles with an aerodynamic diameter of 10 microns as certified by manufacturer data sheets, or
 - b) An overall particulate emission outlet concentration of no more than 0.015 grains/ dry standard cubic foot under normal operating conditions.
[County Rule 100 §301][County Rule 241§302]
[SIP Rule 3]

C. Operational Requirements for Baghouses

The Permittee shall operate and maintain the baghouse in accordance with the requirements of the Operations and Maintenance (O&M) Plan most recently approved in writing by the control officer.
[County Rule 210 §302.1c][County Rule 311 §306][SIP Rule 311 §306]

D. Operational Requirements for Spray Coating Equipment

[County Rule 315 §301][locally enforceable only]

- 1) The Permittee shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:
 - a) The Permittee shall not operate spray coating equipment outside of a building unless it is operated inside an enclosure which has at least three sides a minimum of eight feet in height and able to contain any object(s) being coated.
 - (1) For three-sided enclosures, the Permittee shall direct the spray in a horizontal or downward pointing manner so that overspray is directed at the walls or floor of the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of the top of the enclosure.
 - (2) For enclosures with three sides and a roof, or for complete enclosures, the Permittee shall direct the spray into the enclosure so that the overspray is directed away from any opening in the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of any open top of the enclosure.
 - b) The Permittee shall install and operate a filtering system on any spray booth or enclosure with forced air exhaust.
 - (1) The filtering system shall have an average overspray removal efficiency of at least 92% by weight, as specified in writing by the manufacturer, for the type of material being sprayed.
 - (2) No gaps, sags or holes shall be present in the filters and all exhaust must be discharged into the atmosphere.

[County Rule 315 §301.2][locally enforceable only]

- 2) The controls required for spray coating in County Rule 315 §301, and the conditions of this Permit based upon that requirement, above, shall not apply:
 - a) To the spray coating of buildings or dwellings, including appurtenances and any other ornamental objects that are not normally removed prior to coating;
 - b) To the spray coating of facility equipment or structures which are fixed in a permanent location and cannot easily be moved into an enclosure or spray booth and which are not normally dismantled or moved prior to coating;
 - c) To the spray coating of objects which cannot fit inside of an enclosure with internal dimensions of 10'W x 25'L x 8'H;
 - d) To enclosures and spray booths and exhausts located entirely in a completely enclosed building, providing that any vents or openings do not allow overspray to be emitted into the outside air; or
 - e) To any coating operations utilizing only hand-held aerosol cans.

[County Rule 315 §302][locally enforceable only]

E. Operational Requirements for Coating Wood Furniture and Fixtures

- 1) VOC Content Limitation [County Rule 342 §301.1][SIP Rule 342 §301.1]
The Permittee shall not apply a topcoat or sealer to wood furniture or fixtures unless the VOC content is limited either to the pounds of VOC per pound of solids (kilogram VOC per kilogram of solids) in Column A, or to the grams of VOC per liter in Column B of Table 342-1 below, unless covered by an exemption listed in these permit conditions.

Table 342-1: General VOC Limits of Coatings

Type of Coating	Column A	Column B
	(pounds of VOC per pound of solids)	(grams of VOC per liter, less non-precursor compounds and water)
Topcoat	1.8	635
Sealer	1.9	645
Acid-cured, alkyd amino topcoat	2.0	655
Acid-cured, alkyd amino vinyl sealer	2.3	680

- 2) When a sealer's topcoat does not exceed 0.8 pound of VOC per pound of solids (0.8 kilogram of VOC per kilogram of solids), there is no limit on the VOC content of the sealer.
[County Rule 342 §301.1b][SIP Rule 342 §301.1b]
- 3) Stains, washcoats, glazes, toners, inks, and other coatings not specified in Table 342-1 or the strippable booth coating requirements of these Permit Conditions, do not have limits on VOC content.
[County Rule 342 §301.2][SIP Rule 342 §301.2]
- 4) The Permittee shall not use a strippable booth coating unless, as applied, the coating has no more than 0.8 pounds of VOC per pound of solids or no more than 3.0 pounds of VOC per gallon (360 grams per liter), less non-precursor volatile compounds.
[County Rule 342 §301.2][SIP Rule 342 §301.2]
- 5) Spray Equipment Requirements for Coating Wood Furniture and Fixtures
- a) The Permittee shall not spray wood furniture with coating exceeding 1.0 pound of VOC per pound of solids (1.0 kilogram of VOC per kilogram of solids) without providing evidence of possession and use of a low-pressure spray gun or system, an electrostatic system, or a system in which the energy for atomization is provided principally via hydraulic pressure; this includes air assisted airless and ultra-low-volume-air assisted technologies. Such requirement does not apply to any facility, activity or person specifically exempted by applicable subsections of County Rule 342 § 307, or to any specific system that is approved by the Administrator as having a transfer efficiency consistently exceeding 64 percent.
[County Rule 342 §302.1][SIP Rule 342 §302.1]

- b) The Permittee shall not use a conventional air-atomized spray gun or other restricted use gun, except:
 - (1) To apply finishing materials that have a VOC content not exceeding 1.0 pound of VOC per pound of solids (1.0 kilogram of VOC per kilogram of solids).
[County Rule 342 §302.2a][SIP Rule 342 §302.2a]
 - (2) For touch-up and repair under either of the following conditions:
 - (a) Such application is performed after completion of the entire finishing operation; or
 - (b) Such application is performed after applying stain and before any further coating, by equipment having a total capacity not exceeding 2.1 gallons (or 8 liters).
[County Rule 342 §302.2c][SIP Rule 342 §302.2c]
 - (3) To apply less than 5% of all coating pursuant to County Rule 342 §307.2.e.
[County Rule 342 §302.2d][SIP Rule 342 §302.2d]
- c) The Permittee shall operate and maintain in proper working order all process equipment in which VOC-containing materials are used or stored.
[County Rule 342 §303][SIP Rule 342 §303]
- 6) Booth Cleaning [County Rule 342 §304.1][SIP Rule 342 §304.1]
 - a) The Permittee shall not clean spray booth components using a solvent containing more than 8.0 percent by weight of VOCs, including water and non-precursor compounds, except for: conveyors, continuous coaters and their enclosures, and metal filters.
 - b) If the spray booth coating is being replaced, the Permittee shall use no more than 1.0 gallon (3.8 liters) VOC- solvent to clean the booth.
- 7) Cleaning Guns and Lines [County Rule 342 §304.2][SIP Rule 342 §304.2]
The Permittee shall collect all solvent used to clean spray guns and shall pump or drain all solvent used for line cleaning into non-leaking container(s). Such containers shall be immediately closed or covered after all the solvent has been collected, and shall remain so except when in use.
- 8) Handling and Disposal of VOC [County Rule 342 §305][SIP Rule 342 §305]
 - a) The Permittee shall cover and keep covered each VOC-containing material intended for the day's production, which is not currently in use. The Permittee shall store finishing and cleaning materials in closed containers.
 - b) The Permittee also shall store all VOC-containing materials, including but not limited to rags, waste coatings, waste solvents and their residues, in closed containers which are legibly labeled with their contents and which remain covered when not in use.

- 9) Exemptions from VOC Requirements for Coating Wood Furniture and Fixtures
[County Rule 342 §§307 and 403][SIP Rule 342 §§307 and 403]
- a) Total Exemption:
The following materials are exempt from the requirements of this Permit which are based on County Rule 342: adhesives, architectural coatings, printing ink, and coatings not applied on or over a wood-product substrate.
- b) Partial Exemptions:
- (1) Coatings in aerosol spray cans not exceeding 22 fl. oz. (0.66 liter) capacity used exclusively for touch-up and/or repairs are exempt from all requirements of Section 300 of County Rule 342 and the conditions of this permit that are based upon those requirements.
 - (2) The following shall be exempt from the requirements of County Rule 342 §§301 and 302 and the conditions of this permit that are based upon those requirements:
 - (a) Prepackaged aerosol spray cans which are not used for touch-up or repair, metal leaf finishes, and faux finishes do not have limits on VOC content when the annual total use of all such coating types together is less than 250 gallons (948 liters).
 - (b) Any refinishing operation necessary for preservation, to return the furniture or fixture to original condition, to replace missing furniture to produce a matching set, or to produce custom replica furniture.
 - (3) The coating for a single resin-layer finish which does not exceed a VOC limit of 3 pounds of VOC per pound of solids for completed finishes up to 3 dry mils thickness or does not exceed 2.3 pounds of VOC per pound of solids for finishes over 3 dry mils is exempt from the requirements of County Rule 342 §301.1 and the conditions of this Permit that are based upon those requirements if all of the following conditions are met:
 - (a) The containers are clearly marked: "FOR USE IN SINGLE RESIN-LAYER FINISH,"
 - (b) Facility records clearly identify this material: "DOES NOT MEET THE VOC LIMITS OF SECTION 301, RULE 342 - FOR USE ONLY IN SINGLE RESIN-LAYER FINISHES," and
 - (c) The booth used to apply a single resin-layer finish above 2.3 pounds of VOC per pound of solids is dedicated to that operation only, and is clearly labeled: "FOR SINGLE RESIN-LAYER FINISHES ONLY."
 - (4) In addition to the uses of restricted-use guns allowed under County Rule 342 §302.2 and the conditions of this permit based upon that requirement, the Permittee may use a conventional air atomized or other restricted use gun to apply coatings exceeding 1 lb VOC/lb if all the following conditions are met:
 - (a) The volume of such coating applied in this way is less than five percent (5%) of the total volume of coating applied at the facility;
 - (b) Each gun has a red tag when spraying materials exceeding 1.0

pound of VOC per pound of solids. The red tag shall be a red 4 square-inch vivid, durable tag, sticker, or painted emblem/label visible on the gun or within 3 feet of the gun on the gun's hose;

- (c) A log shall be kept of the amount of coating used by each such gun pursuant to the Recordkeeping Requirements of these Permit Conditions.

F. Operational Requirements for Custom Dip Tanks [County Rule 241 §302]

- 1) The Permittee shall maintain a freeboard ratio, as defined by County Rule 331 §213, of 0.75 or greater in all dip tanks and an impervious cover shall cover the basin whenever work is not being processed.
- 2) The Permittee shall maintain a permanent, conspicuous mark that locates the maximum allowable solvent level that conforms to the freeboard requirements.

20. MONITORING AND RECORDKEEPING REQUIREMENTS

A. Facility-Wide Requirements

- 1) Facility-Wide Emission Limits [County Rule 210 §302.1c]

The Permittee shall monitor for compliance with the facility-wide VOC, PM₁₀ and HAPs emissions limits of Table 1 of these Permit Conditions by monthly calculating and recording the monthly and the rolling 12 month emissions of VOCs, PM₁₀ and HAPs. The calculations shall be made no later than the end of the following month, unless a shorter timeframe is specified elsewhere in these permit conditions. Calculations shall be made according to the following:

- a) VOCs

All VOCs in the materials used in the woodworking operations are assumed to be emitted into the atmosphere unless records acceptable to the Control Officer are kept documenting the quantity and VOC content of VOC containing materials disposed of off site. The Permittee shall maintain an MSDS sheet or other similar documentation of the VOC content of all VOC containing materials used in the woodworking process. The 12 month rolling emissions total shall be calculated by summing the emissions for the most recent complete 12 calendar months. The monthly and rolling 12 month total emissions of VOCs from the facility shall be calculated based upon one of the following two methods.

- (1) Upon initial issuance of this permit and anytime thereafter that the 12 month rolling total of VOC emissions from the facility is less than 90 tons, the Permittee may calculate the facility's VOC emissions based upon the purchase records for each month. Under this scenario, it will be assumed that all VOCs are emitted during the month in which they were purchased. The Permittee shall keep on site purchase records showing the volume of all VOC containing materials purchased each month.
- (2) If the 12 month rolling total of VOC emissions from the facility reaches 90 tons or greater, the Permittee shall begin to record and use actual material usage to calculate facility emissions. The monthly calculation of the 12 month rolling total emissions of VOCs under this scenario shall be completed by the 10th of the

following month. Monthly emissions calculations under this scenario shall be calculated on a weekly basis and shall be performed by the end of the following week.

b) PM_{10}

The rolling 12 month PM_{10} emissions shall be calculated by summing the PM_{10} emissions over the most recent complete 12 months. Monthly PM_{10} emissions shall be calculated according to the following:

$$PM10_{ww} = (S_R * 0.1375) * 0.25 * 0.01$$

Where:

$PM10_{ww}$	= PM_{10} emissions (tons) from woodworking
S_R	= Sawdust removed each month (yd^3)
0.1375	= Weight of one (1) yd^3 of sawdust (tons)
0.25	= Percentage of sawdust assumed to be PM_{10} (25%)
0.01	= 1 minus removal efficiency (99%) of the baghouse

The Permittee shall maintain records of the number of cubic yards (yd^3) of sawdust removed from the facility each month.

c) HAPs

Monthly individual and total HAP emissions shall be calculated assuming that all HAPs in materials purchased in a month are emitted to the atmosphere that month. The Permittee shall maintain on site purchase records showing the volume of all HAP-containing materials purchased each month, and a material safety data sheet (MSDS), certified product data sheet (CPDS), or other information indicating the HAPs content of such materials. The 12 month individual HAP emissions shall be calculated by summing the emissions of each HAP over the most recent complete 12 months. The 12 month total HAP emissions shall be calculated by summing the emissions of total HAPs over the most recent complete 12 months.

If the monthly total HAPs emissions are always less than the monthly emission limit for an individual HAP (0.5 ton), the Permittee need not calculate monthly and 12 month emissions of individual HAPs.

- 2) The Permittee shall maintain a log of complaints of odors detected off-site. The log shall contain a description of the complaint, date and time that the complaint was received, and if given, name and/or phone number of the complainant. The logbook shall describe what actions were performed to investigate the complaint, the results of the investigation, and any corrective actions that were taken.

[County Rule 210 §302.1c(2)]

- 3) The Permittee shall make weekly observations of visible emissions from any source capable of emitting any air contaminant, other than uncombined water, to the ambient air. The Permittee shall log the visual observations, including the date and approximate time when that reading was taken, location of the visible

emissions or a statement that no visible emissions were observed, name of the person who took the observation and any other related information.

[County Rules 300][County Rule 210 §302.1c(1)][SIP Rule 30]

- 4) If visible emissions are observed from any source capable of emitting any air contaminant to the ambient air, other than uncombined water, the Permittee shall obtain an opacity reading conducted in accordance with EPA Reference Method 9 by a certified visible emissions (VE) reader. If the Permittee has not received a compliance status notification or notice of violation of an opacity standard in the 12 months preceding the visual observation, the initial Method 9 reading shall be taken within 3 days of the visual observance. Follow-up Method 9 readings by a certified VE reader shall be taken daily for the emitting equipment thereafter for the next 13 days that the emitting equipment is operated. The Method 9 readings shall be taken with the emitting equipment in operation. After the daily Method 9 readings for 14 days of operation have been obtained, the Permittee shall perform weekly Method 9 readings during each week that the emitting equipment is in operation. The requirement to obtain Method 9 readings shall no longer apply if there are no visible emissions during the operation of the equipment that previously produced the visible emission.

If the Permittee has received a compliance status notification or notice of violation of an opacity standard in the 12 months preceding the visual observation, the initial Method 9 reading shall be taken within 1 day of the visual observance.

If no operation of the emitting equipment occurs on the day that the initial Method 9 reading is required to be taken, then the initial certified Method 9 reading shall be taken the next day that the emitting equipment is in operation. If the problem causing the visible emissions is corrected before the initial Method 9 reading is required, and no emissions are visible with the previously emitting equipment in operation, the Permittee shall not be required to conduct the Method 9 readings.

The Permittee shall log all visual observations including the following:

- a) The date and time that a visible emissions or Method 9 reading was taken;
- b) The name of the person who took the reading;
- c) Whether or not visible emissions were present;
- d) The opacity of visual emissions determined by a Method 9 reading, if applicable;
- e) A description of any corrective actions taken, including date, if applicable;
- f) Any other related information, including all information required to be recorded pursuant to EPA Reference Method 9.

If an opacity violation has occurred at the facility in the 12 months preceding the observation of visible emissions, the required EPA Reference Method 9 reading shall be performed within one production day of the observation.

[County Rule 210 §302.1c(1)][SIP Rule 31]

5) Opacity Readings

- a) Opacity shall be determined by observations of visible emissions conducted in accordance with 40 CFR Part 60 Appendix A, Method 9.
[40 CFR 60.11.b][County Rule 300 §501]
 - b) Opacity of visible emissions from intermittent sources as defined by County Rule 300 §201 shall be determined by observations conducted in accordance with 40 CFR Part 60 Appendix A, Method 9, except that at least 12 rather than 24 consecutive readings shall be required at 15-second intervals for the averaging time.
[County Rule 300 §502][locally enforceable only]
- 6) The Permittee shall maintain a log demonstrating that all training requirements of these permit conditions are being met. At a minimum the log shall include, dates that training was conducted, the names of employees that attended the training, and a list of the activities that each employee was trained to perform.
[County Rule 210 §302.1c]

B. Monitoring and Recordkeeping Requirements for Baghouses

[County Rule 210 §302.1c]

- 1) The Permittee shall properly install, maintain and operate a monitoring device to measure the pressure drop across the baghouse. The Permittee shall take a daily reading of the pressure drop, perform a weekly visible emission observation and record such readings.
- 2) Measurement of a pressure differential outside of the applicable parametric range prescribed by the Operations and Maintenance (O&M) Plan most recently approved in writing by the Control Officer, shall require the Permittee to investigate and take corrective action if necessary to bring the control device into proper operation.
- 3) The Permittee shall record the period of measurement of a pressure differential outside the applicable parametric range prescribed by the baghouse O&M plan, the evaluation of the cause of the measurement, and corrective actions taken pursuant to B.2) of this subsection or a finding that the pressure differential returned to the applicable parametric range without action by the Permittee. Operation outside of the applicable parametric range that is due to a process or control device malfunction shall be recorded as such.
- 4) If the frequency of measurement of a pressure differential outside the applicable pressure differential range prescribed by the baghouse O&M plan or other information indicate that the baghouse is not being operated in a manner consistent with good air pollution control practices, the Control Officer may require the Permittee to submit a Corrective Action Plan (CAP).
- 5) The Control Officer may require the CAP contain one or more of the following elements:
 - a) Improved preventive maintenance practices.
 - b) Improved baghouse operating practices.
 - c) Process operation changes.

- d) Other actions appropriate to improve baghouse performance.
 - e) Schedule for CAP implementation and periodic reporting on the progress of CAP implementation.
- 6) If the Permittee or the Control Officer determines that the pressure drop parameters for the baghouse as specified in the O&M Plan are not representative of normal and proper operation of the baghouse, the Permittee shall submit an amendment to the O&M Plan to address the necessary revision within 30 days of such determination. Such amendments shall be sent to the Department, to the attention of Manager, Title V Permits Group.
 - 7) The Permittee shall maintain on site manufacturer's information stating the removal efficiency of the baghouse filters.

[County Rule 210 §302.1e]

C. Monitoring and Recordkeeping Requirements for Spray Coating

[County Rule 210 §§302.1d and 302.1e][County Rule 315]

- 1) Should the Permittee operate any spray coating equipment inside an enclosure that is located outside of a building, the Permittee shall weekly observe spraying activity occurring in such enclosures to ensure the following:
 - a) No spraying is conducted within three feet of any open end, or within two feet of any open top of the enclosure; and
 - b) The spray is directed in a horizontal or downward pointing manner for three-sided enclosures, or away from any opening for complete enclosures and three-sided enclosures with roofs.

The Permittee shall log the results of the inspections, including the name of the person conducting the inspection, the date of the inspection, and any action taken to correct incorrect application, if applicable.
- 2) The Permittee shall inspect each filter installed on a spray booth or enclosure, for gaps, sags or holes each day of operation.
 - a) Should the Permittee observe any gaps, sags or holes in any of the filters, the Permittee shall immediately repair or replace the filter and record the name of the inspector, the location of filtering system containing the filter (if more than one spray booth), and the date that the filter was replaced.
 - b) If no gaps, sags or holes are observed in any of the filters, the Permittee shall record the name of the inspector, the location of the filtering system containing the filter (if more than one spray booth), and the date that the filter was inspected.
- 3) The Permittee shall maintain on file and make available to the Control Officer upon request, a copy of the manufacturer's specifications verifying that the average overspray removal efficiency for the filter is at least 92%.
- 4) The Permittee shall inspect the facility monthly for evidence of any spraying activity that occurred outside of any enclosure required by these Permit Conditions. The Permittee shall record the results of the inspection, including the name of the person conducting the inspection and the date of the inspection.

D. Monitoring and Recordkeeping Requirements for Coating Wood Furniture and Fixtures

- 1) The Permittee shall keep the following records and lists in a consistent and complete manner and shall make them available to the Control Officer without delay during normal business hours. Each record shall be maintained for a minimum of five years.
 - a) Current List of VOC Containing Material
The Permittee shall maintain a current list of all VOC-containing material which contains the name or code of each material and its VOC content, expressed in accordance with County Rule 342 §§501.1b and 501.1c. Any qualified single resin-layer finish shall be identified as such.
 - b) Current List of Mix Ratios
The Permittee shall maintain a current list of the manufacturer's recommended mix ratio of components, including but not limited to addition of reducers and catalysts/hardeners, except when the manufacturer has no recommendations for any additions.
[County Rule 342 §501][SIP Rule 342 §501]
- 2) The Permittee shall maintain daily records indicating the amount and VOC content of each day's use of each topcoat, sealer, or booth material that exceeds applicable VOC limits contained in County Rule 342 §§301 or 304 and the conditions of this Permit based upon those requirements. The records shall be logged and totaled by the end of the following workday. VOC content shall be entered for each such material.
[County Rule 342 §501.2a][SIP Rule 342 §501.2a]
- 3) The Permittee shall maintain the following monthly records for material compliant with County Rule 342 §§301 and 304, and the conditions of this Permit based upon those requirements, and shall update such records prior to the conclusion of the following month:
 - a) For each topcoat and sealer to which reducer is added at any time after its arrival at a facility, enter the VOC content in lb VOC/lb Solids or in grams/liter (lb/gal) less water and non-precursor organic compounds.
 - b) The amount of coating, the amount of catalyst/hardener, and the amount of reducer/coating diluent used.
 - c) The quantity and type of organic solvent used each month for stripping and cleaning.
 - d) The quantity of organic solvent disposed of offsite during the month just ended.
 - e) Exception: The Permittee shall update yearly the totals of usage of each VOC-containing material known to be used in quantities less than 15 gallons (or 57 liters) per year.
[County Rule 342 §501.2b][SIP Rule 342 §501.2b]

The Permittee shall not be required to maintain records of the VOC content of any mixture of any coatings regulated by County Rule 342 as long as no individual coating in the mixture exceeds the VOC limits for coatings in Table 342-1. If any diluent, as defined in County Rule 342 §211, is mixed with a coating regulated by Table 342-1, and the diluent has a VOC content in excess of the maximum VOC content of the coating allowed by Table 342-1, records of the mixture shall be kept according to County Rule 342 §501.2b.

- 4) The Permittee shall keep records on the use of conventional air-atomized spray equipment and other restricted-use guns associated with County Rule 342 §302 and the conditions of this Permit based on those requirements. The records shall be kept according to the following:
 - a) A log shall be kept of the amount of coating exceeding 1 pound of VOC per pound of solid used by each conventional air-atomized or other restricted use gun. This log shall be updated daily or each time coating is added to the gun's coating reservoir.

[County Rule 342 §307.2e(3)][SIP Rule 342 §307.2e(3)]
 - b) Records shall show for each semi-annual period the total volume (VR) of coatings used during that semi-annual period exceeding 1.0 pound of VOC per pound of solids (or 1.0 kilogram of VOC per kilogram of solids) applied with conventional air-atomized spray equipment and other restricted-use guns.

[County Rule 342 §501.2c][SIP Rule 342 §501.2c]
 - c) Records shall show for each semi-annual period the total volume of all finishing materials (AMV) used throughout the facility.

[County Rule 342 §501.2c][SIP Rule 342 §501.2c]
 - d) The total volume (VR) so applied over the previous six months shall be divided by the total of all coatings used in the same period (AMV) and these calculations and the result shall be entered in the log.

[County Rule 342 §501.2c][SIP Rule 342 §501.2c]
- 5) The Permittee shall maintain records of disposal/recovery of all VOC containing materials.

[County Rule 342 §501.3][SIP Rule 342 §501.3]

21. REPORTING REQUIREMENTS

**NOTE: Additional reporting requirements are found in the general conditions of this permit, and in each section of the Specific Conditions for Potential Support Activities.*

A. Semi-Annual Monitoring Report

The Permittee shall submit a semi-annual monitoring report, which shall be certified as to its truth, accuracy and completeness by a responsible official in the manner required by County Rule 210 §§301.7 and 305.1(e), and which shall contain the following information, at a minimum:

- 1) Emissions Calculations [County Rule 210 §302.1e]

The Permittee shall include the results of the monthly and the rolling 12-month emissions calculations for each month in the six-month reporting period.
- 2) Deviation Reporting [County Rule 210 §302.1e(1)]

The Permittee shall identify all instances of deviations from permit requirements in the semi-annual monitoring report. The Permittee shall include the probable cause of such deviations, and any corrective actions or preventive measures taken.
- 3) Odor Log [County Rule 210 §302.1e(1)][County Rule 320]

The Permittee shall provide a copy of the portion of the odor log that covers the applicable 6 month reporting period. If no complaints were received during the reporting period, a statement to that effect may be substituted for a copy of the odor log.

- 4) Visible Emissions [County Rule 210 §302.1e][County Rule 311]
 - a) The dates of any week that the required visible emissions observations were not taken, an explanation for the deviation from that monitoring requirement, and a description of any action taken to ensure that the future observations are performed, if applicable.
 - b) Any date on which visible emissions were observed;
 - c) The approximate time of the observation;
 - d) Name of the observer;
 - e) A description of any corrective actions taken, if any, to reduce the visible emissions;
 - f) If a follow-up Method 9 reading was required, the opacity of the emissions determined by Method 9 and a copy of the visual determination of opacity record showing all information required by the Method) Any other related information.
- 5) Spray Coating [County Rule 210 §302.1e][County Rule 315]
 - a) Should the Permittee operate spray coating equipment inside of an enclosure that is located outside of a building, the Permittee shall provide the following information:
 - (1) Any date that monitoring of spraying activity was required but not performed, an explanation for the deviation from that monitoring requirement, and a description of any action taken to ensure that required monitoring is performed in the future, if applicable.
 - (2) Dates that spraying activity was observed being conducted incorrectly, and any corrective actions taken, if necessary.
 - b) Should the Permittee operate any spray coating equipment with a filtering system on a spray booth or enclosure with forced air exhaust, the Permittee shall provide the following information:
 - (1) Any date that any such spray booth or enclosure was used, but the filters were not inspected for gaps, sags or holes. The Permittee shall also include an explanation for the deviation from that monitoring requirement, and a description of any action taken to ensure that required monitoring is performed in the future, if applicable.
 - (2) Details of the make and manufacturer of each filter used as well as its overspray control efficiency.
- 6) Coating Wood Furniture and Fixtures [County Rule 210 §302.1e][County Rule 342]
 - a) A list of coatings regulated by County Rule 342 that were used at the facility during the six month period, along with the VOC content of each coating.

- b) If any conventional air-atomized or other restricted use guns were used during the six month period, a description of the exemption that applies to the use of such guns and justification for the exemption.

22. TESTING REQUIREMENTS

The Permittee shall conduct a source test of the baghouse within 180 days after Issue date of this permit. The Permittee shall conduct a source test of baghouse #2 within 180 days after the date of startup of the second baghouse. The source tests shall be to verify that the Permittee is capable of operating the baghouse at

- 1) no less than 99.5 % removal efficiency for particles with an aerodynamic diameter of 10 microns or less or
- 2) an overall particulate emission outlet concentration of no more than 0.015 grains/dry standard cubic foot under normal operating conditions.

The test shall be conducted using appropriate EPA Method 5 and in accordance with a test protocol submitted to the Department at least 60 days prior to the test and approved in writing by the Department. The baghouse shall be operated during testing in accordance with the O&M plan. The pressure drop and visible emissions operational parameters shall be measurable and capable of later indication that the unit is operating within the permitted limits, shall be listed in the protocol and recorded during testing. The Permittee shall notify the Department in writing at least ten days ahead of the performance test to allow Department representatives to be present during testing. The notice shall include the date and time that the testing is to be conducted. Within 45 days after completion of the performance test, a copy of all test results shall be submitted to the Department for review and approval.

Test protocol, performance test notification, and the copy of all test results submitted to the Department shall be to the attention: Air Quality Technical Services Unit Manager.

SPECIFIC CONDITIONS FOR POTENTIAL SUPPORT ACTIVITIES

23. PERMIT CONDITIONS FOR ARCHITECTURAL COATING

A. Operational Limitations and Standards

- 1) The Permittee shall limit the volatile organic compound (VOC) content of architectural coatings as follows:

- a) Bituminous Pavement Sealer

[County Rule 335 §301][SIP Rule 335 §301]

The Permittee shall not apply any architectural coating manufactured after July 13, 1988, which is recommended for use as a bituminous pavement sealer unless it is an emulsion type coating.

- b) Non-Flat Architectural Coating

[County Rule 335 §303][SIP Rule 335 §303]

The Permittee shall not apply any non-flat architectural coating manufactured after July 13, 1990, which contains more than 2.1 lbs (250 g/l) of volatile organic compounds per gallon of coating, excluding water

and any colorant added to tint bases. These limits do not apply to specialty coatings listed below.

- c) Flat Architectural Coating [County Rule 335 §304][SIP Rule 335 §304]
The Permittee shall not apply any flat architectural coating manufactured after July 13, 1989, which contains more than 2.1 lbs (250 g/l) of volatile organic compounds per gallon of coating, excluding water and any colorant added to tint bases. These limits do not apply to specialty coatings listed below.
- d) Specialty Coatings [County Rule 335 §305][SIP Rule 335 §305]
The Permittee shall not apply any architectural coating manufactured after July 13, 1991 that exceeds the following limits. The limits are expressed in pounds of VOC per gallon of coating as applied, excluding water and any colorant added to tint bases.

<u>COATING</u>	<u>(lb/gal)</u>
Concrete Curing Compounds	2.9
Dry Fog Coating	
Flat	3.5
Non-flat	3.3
Enamel Undercoaters	2.9
General Primers, Sealers and Undercoaters	2.9
Industrial Maintenance Primers and Topcoats	
Alkyds	3.5
Catalyzed Epoxy	3.5
Bituminous Coating Materials	3.5
Inorganic Polymers	3.5
Vinyl Chloride Polymers	3.5
Chlorinated Rubbers	3.5
Acrylic Polymers	3.5
Urethane Polymers	3.5
Silicones	3.5
Unique Vehicles	3.5
Lacquers	5.7
Opaque Stains	2.9
Wood Preservatives	2.9
Quick Dry Enamels	3.3
Roof Coatings	2.5
Semi-transparent Stains	2.9
Semi-transparent and Clear Wood Preservatives	2.9
Opaque Wood Preservatives	2.9
Specialty Flat Products	3.3
Specialty Primers, Sealers & Undercoaters	2.9
Traffic Coatings	
Applied to Public Streets and Highways	2.1
Applied to other Surfaces	2.1
Black Traffic Coatings	2.1

Varnishes	2.9
Waterproof Mastic Coating	2.5
Waterproof Sealers	3.3

e) Exemptions

[County Rule 335 §§306and 307][SIP Rule 335 §§306and 307]

The VOC content requirement of this Section shall not apply to the following:

- (1) Architectural coatings supplied in containers having capacities of one quart or less.
- (2) Architectural coatings recommended by the manufacturer for use solely as one or more of the following:
 - (a) Below ground wood preservative coatings.
 - (b) Bond breakers.
 - (c) Fire retardant coatings.
 - (d) Graphic arts coatings (sign paints)
 - (e) Mastic texture coatings.
 - (f) Metallic pigmented coatings.
 - (g) Multi-colored paints.
 - (h) Quick-dry primers, sealers and undercoaters.
 - (i) Shellacs.
 - (j) Swimming pool paints.
 - (k) Tile-like glaze coatings.

B. Monitoring and Recordkeeping Requirements

[County Rule 210 §302.1c] [County Rule 210 §302.1e]

The Permittee shall keep a material list of all coatings used. The material list shall contain the name of each coating, a short description of the material, the pounds of VOCs per gallon of coating excluding water and colorant added to tint bases, and the amount of each coating used. If the coating is exempt from the volatile organic compounds content requirements, the justification for the determination shall be documented and kept on file.

C. Reporting Requirements

[County Rule 210 §302.1e]

The Permittee shall include a statement whether or not architectural coating was performed during the six month reporting period in the semi-annual monitoring report.

24. PERMIT CONDITIONS FOR CUTBACK AND EMULSIFIED ASPHALT

A. Operational Limitations and Standards

- 1) The VOC content of asphalt materials shall be limited as follows:
 - a) The Permittee shall not use or apply the following materials for paving, construction, or maintenance of highways, streets, driveways, parking lots, roads, nor shall they be applied onto soil and earthworks:
 - (1) Rapid cure cutback asphalt.

- (2) Any cutback asphalt material, road oils, or tar which contains more than 0.5 percent by volume VOCs which evaporate at 500⁰F (260⁰C) or less using ASTM Test Method D 402-76.
 - (3) Any emulsified asphalt or emulsified tar containing more than 3.0 percent by volume VOCs which evaporate at 500⁰F (260⁰C) or less as determined by ASTM Method D 244-89.
[County Rule 340 §301][SIP Rule 340 §301]
 - b) The Permittee shall not store for use any emulsified or cutback asphalt product which contains more than 0.5 percent by volume solvent-VOC unless such material lot includes a designation of solvent-VOC content on data sheet(s) expressed in percent solvent-VOC by volume.
[County Rule 340 §303][SIP Rule 340 §303]
- 2) The VOC content limitations of this Section do not apply to the following:
- a) Asphalt that is used solely as a penetrating prime coat and which is not a rapid cure cutback asphalt. Penetrating prime coats do not include dust palliatives or tack coats.
[County Rule 340 §302.1][SIP Rule 340 §302.1]
 - b) The Permittee may use up to 3.0 percent solvent-VOC by volume for batches of asphalt rubber which cannot meet paving specifications by adding heat alone only if request is made to the Control Officer, who shall evaluate such requests on a case-by-case basis. The Permittee shall keep complete records and full information is supplied including savings realized by using discarded tires. The Permittee shall not exceed 1100 lbs (500 kg) usage of solvent-VOC in asphalt rubber in a calendar year unless the Permittee can demonstrate that in the previous 12 months no solvent-VOC has been added to at least 95 percent by weight of all the asphalt rubber binder made by the Permittee or caused to be made for the Permittee. This Permit Condition does not apply to batches which yield 0.5 percent or less solvent-VOC evaporated using the test in County Rule 340§ 502.1.
[County Rule 340 §302.3][SIP Rule 340 §302.3]

B. Monitoring and Recordkeeping Requirements

[County 210 §302.1c(2)][County Rule 340 §501][SIP Rule 340 §501]

- 1) The Permittee shall keep daily records of the amount and type of asphalt/bituminous material containing more than 0.5 percent by volume solvent-VOCs which is used at the facility. Records must show the solvent-VOC content of this material.
- 2) Material Safety Data Sheets (MSDS) or technical data sheets shall be kept available for any asphalt materials used at the facility. Records must be maintained in a readily accessible location and must be made available to the Control Officer upon request.

C. Reporting Requirements

[County Rule 210 §302.1e(1)]

The Permittee shall include the following information in the semi-annual monitoring report:

- 1) Any dates that the required monitoring associated with cutback and emulsified asphalt was not conducted, a justification for the deviation from those

requirements, and any actions taken to ensure that required monitoring is conducted in the future, if applicable.

- 2) A listing of any asphalt used that exceeded the VOC content limitations of County Rule 340 §301 and Conditions of this Permit based upon that requirement, and whether the exceedance was covered by an exemption covered by County Rule 340 §302 and Conditions of this Permit based upon that requirement, or whether it was a deviation from the requirements of these Permit Conditions.

APPENDIX A
Equipment List for Trendwood, Inc.
261 East University
Permit V99-001

Table 1: Trendwood University Facility Woodworking Equipment Roster

Source ID	Manufacturer/ Model (or equivalent)	Quantity	Rating or Exhaust Flowrate	Route to Control Equipment?
Control Equipment				
DC-3	Murphy Rogers Bag House	1		N/A
DC-4	Cincinnati 1005 Drum Dust Collectors	2	1 HP	N/A
Sanders, Shapers, and Profilers				
SS-1	CEMCO 3-Head Finish Sander	1	140 HP	DC-3
Routers, Tenoners and Boring Machines				
RT-3	Nichols Vertical Boring Machine	1	4 HP	
RT-6	Crow Custom Built Drill	1	4 HP	N/A
RT-7	Ritter R800 Horizontal Drill	1	2 HP	N/A
Saws				
SW-1	Powermatic 66 Table Saw	1	4 HP	DC-4
SW-2	Whirlwind 212 Cutoff Saw	2	10 HP	DC-4
SW-3	SCMI Mini-Max 3-45 Bandsaw	1	1.8 HP	
SW-4	Delta 34-800 Mitre SAW	1		

Table 2: Evaporative Pollutant Emission Source Data

Source ID	Manufacturer/ Dimensions	Stack Dimensions	Fan Rating (HP)	Exhaust Flowrate (CFM)
Booth-1	Binks, 20'Wx10'Dx10'H	18" Diameter 30" Height	3	10000
Booth-2	Binks, 10'Wx10'Dx10'H	18" Diameter 30" Height	3	10000
Booth-3	Binks, 10'Wx10'Dx10'H	18" Diameter 30" Height	3	10000
Booth-4	Binks, 10'Wx10'Dx10'H	18" Diameter 30" Height	3	10000
Booth-5	Binks, 10'Wx10'Dx10'H	18" Diameter 30" Height	3	10000
Dip Tank -1	Custom 4'Wx 2'Dx 6'H			
Dip Tank -2	Custom 4'Wx 2'Dx 6'H			
Coater-1	Vacuum Coater for Waterborne Coatings Delle Vendove Vacuumizer Model 612	None	2@7.5	N/A

Technical Support Document (TSD)

Trendwood, Inc.

261 East University Drive Facility

Permit Number: V99-001

November 30, 2002

I. COMPANY DESCRIPTION

The Trendwood, Inc. facility located at 261 East University Drive (Trendwood or Trendwood University hereafter) is employed in the manufacture of wood household furniture (primary SIC Code 2511). As of the date of the issuance of the Title V permit, Trendwood University is primarily engaged in the assembly, finish sanding, and surface coating of wood furniture pieces that arrive at the facility unassembled. In the future, Trendwood anticipates more extensive wood working operations at the facility.

Company Information:

Facility Name: Trendwood, Inc.

Facility Address: 261 East University Drive
Phoenix, Arizona 85004

Mailing Address: 2402 South 15th Avenue
Peoria, AZ 85007

II. APPLICABLE REQUIREMENTS

A. Facility-wide Emission limits from Installation and Unitary Permits (Permit Condition 18.A.1))

Table 1: Facility-Wide Emissions Limits

	Monthly Emission Limits	*Rolling 12 - Month Emission Limits
Total Volatile Organic Compounds (VOCs)	10 tons	99 tons
PM ₁₀	1.0 ton	10 tons
Any Single Hazardous Air Pollutant (HAP)	0.5 ton	5 tons
Total Hazardous Air Pollutants (HAPs)	1.0 ton	5 tons

** See Monitoring and Recordkeeping Requirements [of the Permit Conditions] for the calculation methodology.*

1. Discussion

a) VOC Emission Limits

Volatile Organic Compound (VOC) emissions at the Trendwood University facility are limited to 10 tons per month and 99 tons per year. The limits are the same as those previously permitted (Permit Number 94-0238).

The source was permitted (permit number 940238) as a minor source when the major source threshold was 100 tons of VOCs per year. At that

time, the source would have gone through non-attainment new source review (NSR) had it been permitted as major, in addition to requiring a Title V permit.

In 1997, Maricopa County was downgraded to a "serious" non-attainment area for Ozone, which tightened the major source threshold for VOCs to 50 tons per year. At that time, Trendwood was required to submit a Title V application, but was not required to go through NSR. However, the 99 ton limit is still an applicable requirement because it serves as an "avoidance" permit condition for NSR.

b) **PM₁₀ Emissions Limits**

The Trendwood University facility PM₁₀ emissions are limited to 1 ton per month and 10 tons per year. The limits are the same as those previously permitted (Permit Number 94-0238). Trendwood University will comply with these limits by operating an approved baghouse, and by calculating emissions monthly, as discussed below.

c) **HAP Emissions Limits**

The individual and aggregate HAP emission limits are the same as those allowed in the previous permit. The limits were voluntarily accepted as part of Permit 94-0238 by the Permittee. The HAPs emission limits are federally enforceable, and consistent with 40 CFR 63.800, ensure that the Trendwood University facility remains minor source of HAPs for the purpose of determining applicability of the NESHAP for Wood Furniture Manufacturers.

2. **Monitoring for Compliance with Facility-wide Emissions Limitations**

The Permittee is required to monitor for compliance with this permit condition by calculating and recording the monthly and rolling 12 month totals of VOCs PM₁₀ and HAPs each month (**Permit Condition 20.A.1**).

a) If the facility emits less than 90 tpy of VOCs, VOC emissions will be calculated assuming that all VOCs in materials purchased in a month are emitted that month. Trendwood will keep records of VOC containing materials purchased at the facility each month, along with the VOC content of such materials. If, in any month, Trendwood calculates 12 month rolling VOC emissions of 90 tons or greater, the facility will calculate emissions of VOCs based on usage records, instead of purchase records. The Permittee will then update its monthly VOC calculation each week of the month. If the Permittee wants to account for VOCs not emitted to the atmosphere, disposal records of VOC containing materials are required to be kept.

b) PM₁₀ emissions will be calculated using a mass balance methodology around the baghouse based on tons of sawdust removed each month. The tons of sawdust removed each month will be calculated by multiplying the number of cubic yards (yd³) of sawdust removed from the facility each month by the weight of a cubic yard of sawdust. According to the National Recycling Coalition Measurement Standards and Reporting Guidelines, a dry cubic yard of sawdust weighs 275 pounds, or 0.1375

tons. Trendwood will keep track of the number of cubic yards of sawdust removed from the facility each month (**Permit Condition 20.A.1b**). Currently, Trendwood uses an 8yd³ waste bin.

The calculations assume that twenty five percent (25%) of the sawdust removed is PM₁₀, based on a draft report entitled "Estimating Emissions from Generation and Combustion of "Waste" Wood, by the North Carolina Department of Environment and Natural Resources. That report estimates typical percentage of wood waste as well as the fraction of such wood wastes that is PM₁₀. For sanding operations, like those conducted at this facility, 25% of the wood waste is estimated. The operating efficiency of the baghouse is assumed to be 99%, based on manufacturer's information (see minor modification 2-15-02-01 to permit number 940238). Particulate matter emissions from the spray booths based on best engineering estimates contain little or no PM₁₀, and will not be included in the calculations. Particulate matter emissions from the spray booths based on best engineering estimates contain little or no PM₁₀, and will not be included in the calculations.

The assumption that the baghouse is operating at 99% removal efficiency for PM₁₀ requires proper operation of the baghouse. As such, Trendwood is required (**Permit Condition 19.C**) to operate its baghouse in accordance with the baghouse O&M plan most recently approved in writing by the Control Officer. The O&M plan specifies a pressure drop range, selected as representative of normal operation based on manufacturer's information and operator experience.

The pressure drop across the baghouse will be monitored and recorded daily and perform a weekly visible emission observation and record such readings (**Permit Condition 20.B**). If the baghouse is found to be operating outside of the operating range specified in the baghouse O&M Plan, the Permittee will investigate the cause of the reading, and record the result of the investigation and any corrective action taken, or a finding that the pressure drop returned to the specified operating range by itself.

Trendwood may find, after some period of operation of the baghouse, that the operating range specified in its O&M plan is not representative of normal and proper baghouse operation. If the Control Officer or Trendwood makes such a determination, Trendwood is required (**Permit Condition 20.B.6**) to submit an amendment to the O&M Plan to address the necessary revision to the operating range within 30 days of such determination.

If there are indications that the baghouse is being operated contrary to good engineering practice the Control Officer may require the submittal of a Corrective Action Plan (CAP) in accordance with **Permit Conditions 20.B.4 and 5**. The Control Officer retains the right to issue compliance notifications at his discretion.

- c) Total HAP emissions will be calculated based on purchase records of HAP containing materials at the facility each month and HAP concentrations in

such materials as given on a manufacturer's data sheet or laboratory data. All HAPs in materials purchased in a month will be assumed to be emitted that month. The individual HAPs emissions will not need to be calculated if the total HAPs emitted in a month are always less than the monthly limit of individual HAPs (0.5 ton).

B. Particulate Matter - County Rules 311 and 241 (Permit Conditions 18.A.2) and 19.C.2))

1. Discussion

Process Weight Rate Equation (**Permit Condition 18.A.2)a)**

The facility is subject to County Rule 311, Particulate Matter from Process Industries, which imposes a cap on hourly emissions of particulate matter based on the process weight of material at the facility. The facility does not process more than 60,000 pounds per day of material, therefore, the applicable requirement is County Rule 311 §301.1, with the following process weight rate equation:

$$E = 3.59P^{0.62}$$

Where:

E = Emissions in pounds per hour, and

P = Process weight rate in tons per hour.

Also applicable are County Rule 311 §§305 and 306, which allow Trendwood to comply with the particulate matter standard by operating an approved "emission control system" with an approved O&M plan. Trendwood operates one emissions control system, a Murphy Rogers pulse-jet baghouse with an exhaust flowrate of 60,000 CFM.

2. Monitoring for Compliance with Particulate Matter Requirements

Process Weight Rate Equation

In the minor modification application that added the sander and the baghouse to Trendwood's permit, Trendwood estimated that the facility would remove two 8 yd³ dumpsters of sawdust from the facility each month, or 16 yd³ of sawdust per month (192 yd³/year). According to the National Recycling Coalition Measurement Standards and Reporting Guidelines, a dry cubic yard of sawdust weighs 275 pounds, or 0.1375 tons. Multiplying the cubic yards of sawdust removed from the facility per year by the weight of a cubic yard of sawdust yields the tonnage of sawdust removed from the facility each month as follows:

$$\left(192 \frac{yd^3}{year}\right) * \left(275 \frac{lbs}{yd^3}\right) = 52800 \frac{lbs \text{ sawdust}}{year}$$

A draft report entitled "Estimating Emissions from Generation and Combustion of 'Waste' Wood," (North Carolina Report) by the North Carolina Department of Environment and Natural Resources, estimates that 76% of wood waste generated by sanding at woodworking facilities has an aerodynamic diameter of 100 micron or less. Sanding is currently the only woodworking activity at the facility. Assuming that 76% percent of the sawdust removed from the

facility per year is PM₁₀₀, 40,128 lbs (~20 tons) of PM₁₀₀ is removed from the facility each year.

According to the minor modification, the baghouse filters have a removal efficiency of 99.9% for particles 10 micron and larger. Based on collection of 20 tons/ year of PM, the emissions of particulate matter from the facility can be estimated as $(.001) \times (20) \sim 0.02$ tons per year or 40 lbs per year. Assuming the facility operates 2080 hrs per year, the particulate matter emissions from the facility would equal 0.02 lbs/ hr.

At this time, Trendwood will not be required to perform the calculation of the daily emissions rates because proper operation of the baghouse will ensure that the source is well within the limits specified by the process weight rate equation. A limit of .02 lbs/ hr would result if Trendwood were only processing 0.4 lbs of wood per hour. As a wood furniture manufacturer, Trendwood can be expected to process many times this weight of wood per hour, ensuring that the emissions limit dictated by the process weight rate equation will always be in excess of its maximum emissions. To ensure proper operation of the baghouse Trendwood will comply with its approved Operations and Maintenance (O&M) Plan and monitor the pressure drop across the baghouse, as previously discussed. Trendwood received approval for its O&M Plan for the Murphy Rogers Baghouse on March 25, 2002.

C. County Rule 300 - Opacity Limits (**Permit Condition 18.A.3**)

1. Discussion

County Rule 300 restricts visible emissions from any source to 20% opacity, other than emissions of uncombined water. County Rule 300 and the 20% opacity limitation of these permit conditions are locally enforceable only. SIP Rule 30 and the 40% opacity limitation of these permit conditions are federally enforceable.

2. Monitoring for Compliance with Opacity Limits

Because all woodworking equipment vented outdoors is required to pass through an approved Emission Control System, visible emissions are not expected from the facility. The Permittee will monitor for compliance with the opacity requirements of this permit by performing a weekly walk around the outside of the facility, looking for visible emissions from any source capable of visible emissions other than uncombined water. (**Permit Condition 20.A.3**) An important part of this inspection should be the baghouse. This requirement is intended to regulate the opacity from sources that vent outdoors.

If emissions are observed, and the Permittee has not had an opacity violation in the 12 months preceding the observation, then the Permittee is required to obtain an EPA Method 9 reading by a certified reader within 3 days of the observation. Follow-up Method 9 readings by a certified VE reader shall be taken daily for the emitting equipment thereafter for the next 13 days that the emitting equipment is operated. The Method 9 readings shall be taken with the emitting equipment in operation. After the daily Method 9 readings for 14 days of operation have been obtained, the Permittee shall perform weekly Method 9 readings during each

week that the emitting equipment is in operation. The requirement to obtain Method 9 readings shall no longer apply if there are no visible emissions during the operation of the equipment that previously produced the visible emission.

If the Permittee has received a compliance status notification or notice of violation of an opacity standard in the 12 months preceding the visual observation, the initial Method 9 reading shall be taken within 1 day of the visual observance.

If no operation of the emitting equipment occurs on the day the initial Method 9 reading is required to be taken, then the initial certified Method 9 reading shall be taken the next day that the emitting equipment is in operation. If the problem causing the visible emissions is corrected before the initial Method 9 reading is required, and no emission are visible with the previously emitting equipment in operation, the Permittee shall not be required to conduct the Method 9. (**Permit Condition 20.A.4) and 5)**)

A certified Method 9 reading of greater than 20% opacity at any time constitutes a violation of the opacity limitations of the Permit, regardless of whether visible emissions have persisted for three subsequent days.

D. County Rule 320 - Odors and Gaseous Air Contaminants (**Permit Conditions 19.A.1) 19.A.2) and 19.A.3)**)

1. Discussion

County Rule 320 §§300, 302 and 303, entitled "Standards", "Material containment Required" and "Reasonable Stack Height Required", respectively, apply to this facility and have been incorporated into the permit conditions. Permit conditions dealing with odors are locally enforceable only.

2. Monitoring for Compliance with Rule 320 Limitations

To monitor for compliance with these requirements, the Permittee is required (**Permit Condition 20.A.6)**) to maintain an odor complaint log containing a description of the complaint, date, time and other information and submit a copy of this log with the semi-annual monitoring report.

E. Training (**Permit Condition 19.A.4)**)

1. Discussion

Trendwood is required to conduct training for employees before they operate surface coating equipment, and give refresher training annually. This requirement was a condition of Trendwood's previous permit. The requirement includes training on proper application techniques, cleaning procedures, and equipment setup and adjustment as well as recordkeeping, VOC containment and disposal requirements.

This permit condition is meant to ensure that employees are trained at duties that they will perform. Therefore, if an employee will never be responsible for recordkeeping and there is no other reason for that person to learn the recordkeeping methodology, he will not need to be trained in recordkeeping.

2. Monitoring for Compliance with the Training Requirements

Trendwood is required to keep a log demonstrating that all training requirements are being met. (**Permit Condition 20.A.6)**)

F. Operational Requirements for Woodworking Equipment Vented Outdoors - County Rules 100 §301, 241 §302 and 311 §305 (**Permit Condition 19.B**)

1. Discussion

Trendwood is required to install, operate and maintain an approved emissions control device on all woodworking equipment vented outdoors, excluding hand held equipment.

Minor modification 2-15-02-01 to the facility's previous permit (940238) added woodworking equipment to the facility. This condition was included as part of that modification as a Reasonably Available Control Technology (RACT) requirement, as described in County Rule 241 §302. In addition, Trendwood has elected to comply with County Rule 311 through the operation of an approved emission control device. This requirement is consistent with that election and with County Rule 100 §301, which prohibits air pollution.

Currently, all woodworking equipment at Trendwood that is vented outdoors is vented to the approved baghouse. The Permittee is required to submit an application (modification) for the addition of new woodworking equipment. The modification will be reviewed, in part, for consistency with this requirement before approval.

Note that if the baghouse is down, the Permittee may still operate equipment normally vented to the device, as long as no emissions from the piece of equipment are vented outdoors.

G. County Rule 315 - Spray Coating (**Permit Condition 19.D**)

The permit conditions associated with County Rule 315 - Spray Coating, discussed below, are locally enforceable only. Trendwood regularly uses spray coating equipment to apply coating to wood furniture and fixtures.

1. Discussion

a) Spray Coating Outside Buildings inside Enclosures (**Permit Condition 19.D.1a)**)

If the Permittee operates any spray coating equipment outside of a building, the Permittee is required to conduct such activities inside an enclosure with at least three sides a minimum eight feet in height. In addition, it is required that spraying in such enclosures be conducted so that overspray is directed at the walls or floor of the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of the top of the enclosure.

b) Spray Coating with Forced Air Exhaust (**Permit Condition 19.D.1b)**)

For spray coating equipment with forced air exhaust, County Rule 315 and the Permit require the use of a filtering system with an average overspray removal efficiency of 92% by weight. The Permit also requires that there be no gaps, sags or holes in the filters and that all exhaust is discharged to the atmosphere.

2. Monitoring for Compliance
 - a) Spray Coating Outside Buildings Inside Enclosures (**Permit Condition 20.C.1)**
 Trendwood will monitor for compliance with these requirements by observing spraying activity inside any enclosure located outside of a building each week to ensure that proper spraying techniques are used. The monitoring is not required any week that the Permittee does not spray in such enclosures.
 - b) Monitoring for Compliance: Spray Coating with Forced Air Exhaust (**Permit Condition 20.C.2) and 3)**
 According to manufacturer's information provided in the application, the spray filters at Trendwood have average paint removal efficiencies for various materials of at least 92%. To monitor for compliance with the requirements for spray booths with forced air exhaust, Trendwood will continue to maintain information indicating the removal efficiency of the spray filters on site. Because spray coating wood furniture and fixtures is a main activity conducted by this facility, an inspection of the filters for gaps, sags or holes is required on each spray booth, each day the particular booth operates. Trendwood is required to record the result of the inspections.

H. County Rule 342 - Coating Wood Furniture and Fixtures (**Permit Condition 19.E)**

1. Discussion
 - a) VOC Content Limitations (**Permit Conditions 19.E.1) - 19.E.4)**
 County Rule 342 limits the VOC content of topcoats and sealers applied to wood furniture or fixtures as follows:

Type of Coating	Column A	Column B
	(pounds of VOC per pound of solids)	(grams of VOC per liter, less non-precursor compounds and water)
Topcoat	1.8	635
Sealer	1.9	645
Acid-cured, alkyd amino topcoat	2.0	655
Acid-cured, alkyd amino vinyl sealer	2.3	680

In addition, strippable booth coatings have a limit of 0.8 lbs VOC/ lb solid or no more than 3.0 lbs VOC/ gallon (360 grams per liter), less non-precursor volatile compounds. If the spray booth coating is being replaced the Permittee may not use more than 1 gallon of VOC solvent to clean the booth. Stains, washcoats, glazes, toners, inks, and other coatings do not have limits on VOC content. Solvents for cleaning spray booth components are limited to 8% by weight VOC, including water and non-precursor organic compounds. The VOC content limitation for cleaning solvents does not apply when cleaning conveyors; continuous coaters and their enclosures; and metal filters.

b) Spray equipment for Coating Wood Furniture and Fixtures (**Permit Condition 19.E.5)**)

In addition to the requirements of County Rule 315, Spray Coating, discussed previously, there are spray equipment requirements in County Rule 342. When coating wood furniture and fixtures with a finishing material exceeding 1 lb VOC/ lb solid, the Permittee is required to use a low-pressure spray gun or system, an electrostatic system, or a system in which the energy for atomization is provided principally via hydraulic pressure (including "air assisted airless and ultra-low-volume-air assisted technologies"), or any specific system that is approved by the Administrator as having a transfer efficiency consistently exceeding 64%, or meet criteria for an exemption outlined in the Permit (**Permit Condition 19.E.9b)(4)**). These requirements apply even when the finishing material does not have a maximum VOC content specified by Table 342-1. Rather, this requirement applies to **finishing material**, which is defined in County Rule 342 §216 as "A coating other than one designed solely or principally as an adhesive, temporary maskant, and/or preservative. For wood furniture and fixtures, finishing materials include, but are not limited to, topcoats, sealers, primers, stains, basecoats, washcoats, enamels, toners, glazes, and graining inks."

In addition the Permittee may only use a conventional air-atomized spray gun under certain circumstances: for application of materials with a VOC content not exceeding 1 lb VOC/ lb solids, for touch-up and repair as outlined in the permit conditions, or to apply less than 5%, **by volume**, of all coating.

According to the application, Trendwood primarily uses HVLP guns (Binks, Mach 2 and 2s) for the application of coatings to wood furniture and complies with all other limitations of County Rule 342.

c) Material Containment (**Permit Conditions 19.E.7) and 8)**)

The Permittee is required to collect solvent used in cleaning and store it in non-leaking containers, closed when not in use.

The Permittee is also required to cover and keep covered any VOC-containing materials intended for the day's production, when not in use. The Permittee shall keep VOC-containing materials including but not limited to rags, waste coatings, waste solvents and their residues, in closed containers which are legibly labeled with their contents and which remain covered when "not in use."

For the purposes of this permit condition, the Department has discretion as to the definition of "not in use." Generally, any VOC-containing rags should be considered "not in use" during breaks, lunch, or any time that production stops for more than **10 minutes**. Rags that are used for staining that will be reused with a darker stain, may be considered "in use," even when an operator is not directly handling such rags, at the inspectors discretion. The Permittee should plan production so that the rags that will be reused are not left uncovered for an extended period of

time. If production can not be planned in such a manner, the Permittee should place the rags that will be reused in a covered container labeled for reuse.

- d) Appendices of County Rule 342 (Averaging, Small Coating Source, ECS for VOCs)

Trendwood does not average at this time. Therefore, the requirements for averaging (County Rule 342 Appendix A) have not been included in the permit conditions at this time. Should the Permittee decide to average, the Permittee shall submit a modification to the permit for the incorporation of the averaging requirements.

Trendwood is a major source of VOC's, therefore the simplified provisions of Appendix B of County Rule 342 do not apply. At this time Trendwood does not use an Emissions Control System to limit the emission of VOCs at the facility, therefore the provisions of Appendix C of County Rule 342 do not apply. Should the Permittee decide to install an Emissions Control System, the Permittee shall request approval for the system from the Control Officer through a permit revision.

2. Monitoring for Compliance

- a) VOC Content Limitations (**Permit Condition 20.D.1) and 2)**)

The Permittee will monitor for compliance with these limits by maintaining a current list of materials with each material's VOC content and will maintain **daily** records indicating the amount and VOC content of each day's use of topcoat, sealer, or booth material that **exceeds** the applicable VOC limits, above. Again, a Permittee need not maintain daily records of the amount and VOC content of the listed coating unless the coatings exceed the applicable limits of County Rule 342 §§301 and 304.

- b) Spray Equipment for Coating Wood Furniture (**Permit Condition 20.D.4)**)

To monitor for compliance with the spray equipment requirements, Trendwood is required to maintain records associated with the use any conventional air-atomized spray equipment and other restricted-use guns. These records will include the amount of coating with a VOC content exceeding 1 pound VOC/lb solid used by each such gun, updated daily. The records will also show the total volume of coating applied with such guns in six months, divided by total volume of all coatings used in the same period to come up with the percent of coatings applied with these guns. All of the results will be logged and available for inspection upon request of the control officer.

I. Reporting Requirements

Reporting requirements for Trendwood are found in the General Conditions of the permit (Subsections 1-17), Subsection 21 of the permit, and in each of the Subsections 23 - 26.

Subsection 21.A requires the submission of a semi-annual monitoring report, including deviation reporting. The deviation reporting should be very detailed and

should include information such as any day, week or month that any monitoring was required but not performed, a reason for those deviations, and any action taken to ensure that the monitoring will be performed in the future. Additionally, deviations from specified operating ranges or emission limitations or standards should be included, with any additional information. For example, Trendwood should report any days that the required pressure drop reading was not taken, in addition to any days that the reading was outside of the specified range, the result of the investigation required, and any corrective action that might have been taken.

J. Testing Requirements(Permit Condition 22)

Testing Requirements for Trendwood are found subsection 22 of the permit. This Permit condition requires source testing of each baghouse to verify 99.5% removal efficiency of the the baghouse for particles 10 micron in diameter or less or an overall particle emission outlet concentration of no more than .015 grains/dry standard cubic feet under normal operating conditions.

Maricopa County Rule 200 § 309.2 a) thru e) requires that the Control Officer make certain findings in writing before requiring emission testing. The necessity to require testing is substantiate as follows:

1. The facility will be emitting PM10. Exposure to this pollutant has been determined by the USEPA to adversely affect human health .
2. The test method to be used is Method 5, an EPA approved test method and has been shown to produce scientifically acceptable results.
3. The test method used is EPA Method 5 and has been shown to be technically feasible.
4. The test method used is EPA Method 5 and has been shown to be reasonably accurate.
5. After examining the estimated cost of the test, the Department believes that the cost of a stack-sampling test of the control device performance is reasonable to determine the effectiveness of the control device, to establish a base line of emissions, to avoid potential fines, to establish emissions rate information for environmental justices purposes.

III. STREAMLINING FEDERAL AND COUNTY REQUIREMENTS

Some of the requirements of 40 CFR 63 Subpart JJ and County Rule 342 are similar, allowing for streamlining of the permit conditions. Descriptions of regulations that have been streamlined, as well as explanations, are found in Table 1 of this technical support document (TSD), attached below.

IV. POTENTIALLY APPLICABLE REQUIREMENTS

This permit contains conditions for Solvent Cleaning (County Rule 331), Abrasive Blasting (County Rule 312), Architectural Coating (County Rule 335) and Cutback and Emulsified Asphalt (County Rule 340). These permit conditions have been included to make the Permittee aware of the applicable requirements should these activities be conducted at the facility. According to the application, County Rule 310 does not apply to this facility and all outdoor areas are paved.

Note that the "list" mentioned in the Architectural Coating monitoring section (**Permit**

Condition 24.B) could simply be a compilation of current MSDS sheets.

V. NON-APPLICABLE REGULATIONS

Compliance Assurance Monitoring (CAM) (40 CFR 64)

The application shows that Mastercraft does not use a control device to achieve compliance with any emission limitation or standard for a pollutant for which the source has potential pre-control device emissions greater than or equal to major source levels for that pollutant. Therefore, CAM is not applicable to the facility at this time.

